TSD File Inventory Index

Date: September 8, 2008 Initial: My neces

			· · · · · ·					
Facility Name: Little-Hunghia Mil	tal	Cognetion (Bre Felder Site)						
Facility Identification Number: 1LP 042 8 43 854								
A.1 General Correspondence		B.2 Permit Docket (B.1.2)						
A.2 Part A / Interim Status	V	.1 Correspondence						
.1 Correspondence	V	.2 All Other Permitting Documents (Not Part of the ARA)						
.2 Notification and Acknowledgment	A THE STATE OF THE	C.1 Compliance - (Inspection Reports)						
.3 Part A Application and Amendments	1	C.2 Compliance/Enforcement						
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	T-COLLON TO THE T-COLLON TO T-COLLON TO THE T-COLLON TO T-COLLON TO T-COLLON T					
.5 Change Under Interim Status Requests		.2 Import/Export Notifications						
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents						
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment						
.1 Correspondence		.1 RFA Correspondence						
.2 Reports		.2 Background Reports, Supporting Docs and Studies						
A.4 Closure/Post Closure	4	.3 State Prelim. Investigation Memos						
.1 Correspondence	V	.4 RFA Reports	V					
.2 Closure/Post Closure Plans, Certificates, etc	X	D. 2 Corrective Action/Facility Investigation						
A.5 Ambient Air Monitoring		.1 RFI Correspondence						
.1 Correspondence		.2 RFI Workplan						
.2 Reports		.3 RFI Program Reports and Oversight						
B.1 Administrative Record		.4 RFI Draft /Final Report						
		5. RFI QAPP						

Total -1

.6 RFI QAPP Correspondence	1	.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	+
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	-
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	-
.6 CMI QAPP Correspondence	7.	.9 Environmental Justice	
			-

Note: Transmittal Letter to Be Included with Reports. Comments: (One And Alexander)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

111 West Jackson Blvd. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

Howard Molt, Plant Manager Textron Inc., Townsend Division 6600 South Oak Park Ave Bedford Park, Illinois 60638

RE: Interim Status Acknowledgement

USEPA ID No. IL D042843854

FACILITY NAME: Textron Inc., Townsend Division

Dear Mr. Molt:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for interim status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for interim status. Our opinion will be reevaluated on the basis of this information.

The State of Illinois has received Phase I interim authorization under Section 3006 of RCRA. Because of this authorization you are required to comply with standards prescribed in 35 Illinois Administrative Code, Subtitle G, Chapter I, Subchapter c, Part 725, in lieu of the standards in 40 CFR 265. In addition, you are reminded that operating under interim status does not relieve you of the need to comply with other applicable Federal, State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from the Part A permit application that was sent to USEPA. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR 122.23 and as State regulations allow.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR 122.23; your facility may operate under interim status until such time as an RCRA permit is issued or denied. This will be preceded by a request from this office or the Illinois Environmental Protection Agency for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

If you have questions concerning the Illinois hazardous waste regulations, please contact Mr. Robert Kuykendall at the Illinois EPA, 2200 Churchill Road, Springfield, Illinois 62706. His phone number is (217) 782-6760.

Sincerely yours.

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

Enclosure

cc: M. M. Wilson, VP - Admn.

Of flower



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER		° 1LD042843854	REACKNOWLEDGEMENT
	***************************************	TEXTRON INC 6600 S OAK PARK CHICAGO	IL 60638
Installation address		6600 S DAK PAR CHICAGO	IL 60638

EPA Form 8700-12B (4-80)

09/28/8

EPA Form 8700-12 (6-80)

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

DETACH

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MIG 1 8 1980

CONTINUE ON REVERSE



					WILLIOUS	BLORDER	4 15
X. DI	ESCRIPTION OF H	AZARDOUS WAST	ES (continued from)	front)			
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	the many of the fall by						
B. HAZ	ARDOUS WASTES F	ROM SPECIFIC SOUF	RCES. Enter the four-d	ligit number from 40 CFF	R Part 261.32 for each I	isted hazardous waste f	rom
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E. CH	ARACTERISTICS OF	NON-LISTED HAZA	RDOUS WASTES. Mar	k "X" in the boxes corre	sponding to the characte	eristics of non—listed	
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-	(D001)	(D	002)	(D003)		(D000)	

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

DATE SIGNED

Newarolomolf

HOWARD O. MOLT, PLANT MANAGER

8/13/80

EPA Form 8700-12 (6-80) REVERSE

DETACHA

IU042843854

TOWNSEND TEXTRON

Townsend Fastening Systems
Townsend Division of Textron Inc.

530 West Street Braintree, MA '02184 617/848-3500

February 24, 1986

Mr. David A. Stringham Chief, Solid Waste Branch RCRA Activities Region V P. O. Box A3587 Attention: ATKJG Chicago, Illinois 60690

Dear Mr. Stringham:

I am in receipt of your "request for permit", mailed to us from your office, January of 1986.

This operation is actually closed, and my operation, here in Braintree, Massachusetts, as a survivor and recipient of some of the products from that operation, receive all mail sent to that now closed plant in Chicago, Illinois.

After reviewing your request, I called Tom Golz of your office on Friday, February 14th, and he requested that I send you copies of data that constitute all the engineering information left from that operation. He said he would follow that up with a personal conversation with you.

I ask you for your help in closing the files on this facility that is closed and not our property presently.

Thank you for your assistance.

Dale M. Barnard General Manager

Enc.

cc: Tom Golz
Mac Wilson

TOWNSEND TEXTRON

Townsend Fastening Systems
Townsend Division of Textron Inc.

530 West Street Braintree, MA 02184 617/848-3500

October 16, 1985

U.S. Department of Environmental Protection Mr. Thomas B. Golz 5 HE-12 230 South Dearborn Street Chicago, IL 60604

Dear Mr. Golz:

At your request, and as a result of our phone conversation on October 15, 1985, please find copies of all the files available which have hazardous waste manifests attached for the years 1983, 1984 and 1985 for the closed down plant at 6600 South Park Avenue in Chicago, Illinois.

In reviewing the manifests of both triclorethylene waste and plating sludge, it seems to indicate activity of hauling these wastes in less than the 90 days limit associated with a hazardous waste storage facility.

With this in mind, I ask for your review to see if there is any way we can receive variances, allowing a closing of the files on this non-operating plant, and assume, because of these activities, they were a small quantity generator and did not need to be considered a storage facility. The plating and cleaning line was actually closed in May and June of 1984 and the rest of the operation closed down by February of 1985.

Please note, that with the 1985 information, I have attached a copy of a pre-enforcement conference letter, dated September 20, 1985. The Illinois Environmental Agency has requested that we attend this conference on November 8, 1985 in Springfield, Illinois.

When I called Andy Vollmer and asked for his help, he gave me your name as a representative of the U.S.E.P.A., who would have to approve any variances from regulations. I ask your assistance in corresponding with Andy Vollmer, to resolve the problems that have arisen due to the closing of this plant.

Specifically, we are requesting that the application for a storage permit submitted back on November 19, 1980, be considered as not needed. I also would ask for a delay of that November 8th conference if more time is needed by you to evaluate.

Thank you for your assistance.

Dale M. Barnard General Manager

Enclosures

cc: Andy Vollmer



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION 5**

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-JCK-13

CERTIFIED MAIL RETURN RECEIPT REQUESTED

U.S. EPA ID #:

1LD042843854

TEXTRON INC TOWNSEND DIV 6600 SOUTH DAK PARK AVENUE BEDFORD PARK ΙL

60638

RE: Hazardous Waste Permit Application

Dear Permit Applicant:

As you know, you have previously submitted Part A of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility. Timely submission of "the Part A" has allowed most hazardous waste management facilities to continue to operate under RCRA "interim status" (or the State program equivalent), while complying with applicable technical and recordkeeping standards.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the 1984 Amendments) were enacted to modify RCRA. Under the 1984 Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or hazardous waste constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. In addition, all interim status facilities are subject to corrective action requirements, regardless of whether they have 1) submitted a Part B application, 2) submitted a closure plan, 3) reverted to generator status only, 4) actually closed, or 5) none of these. Unless our Agency has formally terminated the facility's interim status, the corrective action requirements apply. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2 (or the State regulation equivalent).

We must determine whether releases of hazardous waste or hazardous waste constituents have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken or will be taken to eliminate threats to public health or the environment. An important element in our decision process is the information that you provide on the enclosed certification statement. Please read it carefully and either sign it and return it, or return it unsigned with a cover letter of explanation, within 45 days of the date of this letter. At some point in time, public input will be sought to either confirm or deny information you provide, or information we gather on our own, concerning releases and corrective actions.

Please mail your response to the following:

RCRA Activities Region V P. O. Box A3587 Attention: ATKJG Chicago, Illinois 60690

Sincerely yours,

David A. Stringham

Chief, Solid Waste Branch

Enclosure

Please print or type in the unshaded areas only [fill-in,] eas are spaced for elite type, i.e., 12 characters/inch).	Form Approved OMB No. 158-R0175
FO WILL OF THE PROTECTION AGENCY GENERAL INFORMATION	1. EPA I.D. NUMBER 5 I L D 0 4 2 8 4 3 8 5 4 3 D
Consolidated Permits Program GENERAL (Read the "General Instructions" before starting.) LABEC ITEMS	GENERAL INSTRUCTIONS
EPA I.D. NUMBER IL DO 42843854	If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross
III. FACILITY NAME TEXTRON INC	through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent <i>(the area to the</i>
V FACILITY 6500 S OAK PARK CHICAGO, IL 60638	left of the label space lists the information that should appear), please provide it in the proper fill—in area(s) below. If the label is
	complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all
VI FACILITY CHICAGO, IL 60638	items if no label has been provided. Refer to the instructions for detailed item descrip- tions and for the legal authorizations under
II. POLLUTANT CHARACTERISTICS	which this data is collected.
INSTRUCTIONS: Complete A through I to determine whether you need to submit any permit applicat	tion forms to the EPA. If you answer "yes" to any
questions, you must submit this form and the supplemental form listed in the parenthesis following the tif the supplemental form is attached. If you answer "no" to each question, you need not submit any of the supplemental form is attached.	these forms. You may answer no lit your activity
is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions. SPECIFIC QUESTIONS SPECIFIC QUESTIONS SPECIFIC QUESTIONS SPECIFIC QUESTIONS SPECIFIC QUESTIONS SPECIFIC QUESTIONS SPECIFIC QUESTIONS	C QUESTIONS YES NO ATTACHES
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C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in	lity fother than those described ich will result in a discharge to
E. Does or will this facility treat, store, or dispose of punicipal effluent be	nject at this facility industrial or
hezardous wastes? (FORM 3) X taining within one	quarter mile of the well bore, of drinking water? (FORM 4)
water or other fluids which are brought to the surface cial processes such as	nject at this facility fluids for spe- s mining of sulfur by the Frasch
duction, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid (FORM 4)	recovery of geothermal energy?
hydrocarbons? (FORM 4) 1. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the in-	posed stationary source which is industrial categories listed in the
structions and which will potentially emit 100 tons per year of any air pollutant regulated under the	ch will potentially emit 250 tons illutant regulated under the Clean ect or be located in an attainment
Clean Air Act and may affect or be located in an attainment area? (FORM 5) Air Act and may affect or be located in an attainment area? (FORM 5) Air Act and may affect or be located in an attainment area? (FORM 5)	43 44 A5
IV. FACILITY CONTACT	50
A. NAME & TITLE (lost, first, & title) HOWARD MOLT PLANT MANAGER 3	9. PHONE (area code & no.)
	- 415 46 - 51 52 - 55
A. STREET OR P.O. BOX	
3 6 6 Ø Ø SOUTHOAK PARKAVE	
B. CITY OR TOWN C.STATE D. ZIP	38
4 B E D F O R D P A R K	, 3 0 - 1
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	
56600 southoakpark ave	
B. COUNTY NAME	
COUK C. CITY OR TOWN D. STATE E. ZIP	CODE F. COUNTY CODE (if known)
	6 3 8 \$ 2 1
EPA Form 3510-1 (6-80) SEP 2.1 1981	CONTINUE ON REVERS

CONTINUED FROM THE FRONT					
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7		7			
VIII. OPERATOR INFORMATION	A. NAME				B. Is the name listed in Item VIII-A also the
B TOWNSEND DIVISION	N TEXTRO	NINC		1 1 1 1 1 1 1 1	owner?
C. STATUS OF OPERATOR (Enter the appropriate	te letter into the answer	havif "Other" sn	necify	D PHONE (at	eg code & no.)
F = FEDERAL M = PUBLIC (other than federal S = STATE O = OTHER (specify) P = PRIVATE		ecify)	C A	3 1 2 7	3 5 1 1 3 4
E. STREET ON P.O.	BOX C'AVE''				
F, CITY OR TOWN		G.STATE I		INDIAN LAND	on Indian lands?
B B E D F O R D P A R K		40 41 42 47	6 Ø 6 3 8		X NO
X. EXISTING ENVIRONMENTAL PERMITS A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions)	rom Proposed Soul	rces)		
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	16 17 18 E. OTHER	(specify)	36		
3 R 9	16 17 19	1 1 1 1 1 1	(specify)		9
XI. MAP					
Attach to this application a topographic map of the outline of the facility, the location of each of treatment, storage, or disposal facilities, and each	of its existing and pro	oposed intake an	nd discharge stru	ictures, each of its	hazardous waste
water bodies in the map area. See instructions for	precise requirements	is muius undergri	Fq: B/56	an springs, rivers a	ing other surface
XII. NATURE OF BUSINESS (provide a brief description)	>				
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to a			51		
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XIII. CERTIFICATION (see instructions)					
I certify under penalty of law that I have persona attachments and that, based on my inquiry of application, I believe that the information is true	those persons imme	diately responsib	ble for obtaining	g the information	contained in the
false information, including the possibility of fine A. NAME & OFFICIAL TITLE (type or print)	and imprisonment.	a iya alala kare			ATE SIGNED
HOWARD O. MOLT PLANT MANAGER		revald	& Mal	00	1-19-80
M. M. Wilson VP-Administra	ation KAC	evunt	77	M Wilson	9-15-81
'A Form 3510-1 (6-80) REVERSE	The state of the s		inexes and constraint	\$5 	

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PRO			

C. SPACE FOR ADDITIONAL PROCESS CODES ON FOR DESCRIBING OTHER PROCESSES (code "T04). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis, For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste/s/ that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	1 1	METRIC UNIT OF MEASURE CODE
POUNDS		- 1	KILOGRAMS, K
TONS			METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code/s/ from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code/s/ from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
 In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	A. EPA		C.UNIT	
Ξo		OF MEA SURE (enter code)	1, PROCESS CODES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))	
X-1	K 0 5 4	900	P	
X-2	D 0 0 2	400	P	T 0 3 D 8 0
.X-3	D0001	100	P	
X-4	D002			included with above

Continued from page 2.

OTE: Photocopy this page before completing if y. ave more than 26 wastes to list.

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Zo.	MA WA	AZ/			B. ESTIMATED ANNUAL QUANTITY OF WASTE	OF S	UN ME UR ode	A- E r				(ent	er)			2. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
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E. USE THIS SPACE TO LIST ADDITIONAL PRO	CESS CODES FROM TIEM D()) UN PAGE 3.	
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EPA I.D. NO. (enter from page 1)			
I L D Ø 4 2 8 4 3 8 5 4 3 6	•		
V. FACILITY DRAWING			
All existing facilities must include in the space provided on	page 5 a scale drawing of the facility	(see instructions for more detail).	F6: 1/55
TATE DESCRIPTION OF A DAY OF A			
All existing facilities must include photographs (aer treatment and disposal areas; and sites of future sto	ial or ground—level) that clearly	delineate all existing structures	; existing storage, N
Zana and a same a s	rage, treatment or disposal areas	s (see instructions for more detail	ii). 16.56
VII. FACILITY GEOGRAPHIC LOCATION	and the same of t		25 (1945) - 175 (1955)
LATITUDE (degrees, minutes, & second		LONGITUDE (degrees, minutes	, & seconas)
4 1 4 6 2 2 Ø		<u> 20 81 /1 449 1</u>	<u> 40</u>
VIII. FACILITY OWNER			
A. If the facility owner is also the facility operator as skip to Section IX below.	listed in Section VIII on Form 1, "C	eneral Information", place an "X" i	n the box to the left and
B. If the facility owner is not the facility operator as	listed in Section VIII on Form 1, co	mplete the following items:	
I. NAME OF FACI	LITY'S LEGAL OWNER	2. P	HONE NO. (area code & no.)
E TEXTRON		A 0	114211281
15 16		55 56 +	58 S9 - 61 62 S
3. STREET OR P.O. BOX	A. CITY O	R TOWN 5.ST.	6. ZIP CODE
P.O. BOX 878	G PROVIDENCE	R I	A
IX. OWNER CERTIFICATION	15 16	40 48 42	47 - 51
I certify under penalty of law that I have personally	veramined and am familiar with	the information submitted in t	his and all attached
documents, and that based on my inquiry of those	individuals immediately respons	ible for obtaining the informatio	on, I believe that the
submitted information is true, accurate, and comple	ete. I am aware that there are sig	nificant penalties for submitting	g false information,
including the possibility of fine and imprisonment.			
A. NAME (print or type) M. M. Wilson FOR TEXTRON. INC.	B. SIGNATURE DAWALD FM	THE C. DATI	E SIGNED 9-15-8
HOWARD O. MOLT	bawardom	alf.	1-19-80
X, OPERATOR CERTIFICATION			
I certify under penalty of law that I have personally	examined and am familiar with	the information submitted in t	his and all attached
documents, and that based on my inquiry of those	individuals immediately respons	ible for obtaining the information	on, I believe that the
submitted information is true, accurate, and comple	ete. I am aware that there are sig	nificant penalties for submitting	g false information,
including the possibility of fine and imprisonment.			
A. NAME (print or type) M. M. Wilson	B. SIGNATURE	7 May Makan C. DATI	ESIGNED 9-15-87
HOWARD O. MOLT	-Nouvoud fr	7120 F 11-	19-80

EPA SENE	NMENTAL PROTEC RAL INFORM Insolidated Permits Pro Jeneral Instructions	ATION Segrem	I. EPA I.D. NUMBER	3 8 5 4 7/A E
LABELITEMS I EPA I.D. NUMBER IL DU 42843854 FACILITY NAME TEXTRON INC 6600 S OAK PAR			GENERAL INSTRU If a preprinted label has be it in the designated space. F ation carefully; If any of it through it and enter the or appropriate fill—in area belo the preprinted data is absen left of the label space list that should appear), please proper fill—in area(s) below complete and correct, you	en provided, affix leview the informis incorrect, cross prect data in the w. Also, if any of a the information provide it in the v. If the label is
FACILITY 5600 S DAK PAR CHICAGO, IL 6	₹K 60638		Items I, III, V, and VI (emust be completed regard) items if no label has been the instructions for detaitions and for the legal au which this data is collected.	ess). Complete all provided, Refer to led item descriptions under
INSTRUCTIONS: Complete A through J to determine we questions, you must submit this form and the supplement if the supplemental form is attached. If you answer "no" as excluded from permit requirements; see Section C of the	tel form listed in the to each question, yo	parenthesis following the q ou need not submit any of t	uestion, Mark "X" in the box in t hese forms. You may answer "no	the third column " if your activity
SPECIFIC QUESTIONS A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.?	X	B. Does or will this facility include a concentrate	ty (either existing or proposed) d animal feeding operation or- rtion facility which results in a the U.S.2 (FORM 2B)	YES PO ATTACHES
C. is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C) E. Does or will this facility treat, store, or dispose of hazerdous waster? (FORM 3)		D. Is this a proposed fect in A or B above! whi waters of the U.S.? (FC F. Do you or will you in municipal effluent bel	lity (other than those described ich will result in a discharge to DRM 2D). ject at this facility industrial or low the lowermost stratum con-	X 25 26 27
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	χ	underground sources of H. Do you or will you in cal processes such as process, solution min	quarter mile of the well bore, of drinking water? (FORM 4) ject at this facility fluids for spe- mining of sulfur by the Frasching of minerals, in situ combus- recovery of geothermal energy?	X
I, is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	X	NOT one of the 28 instructions and whice per year of any air po	osed stationary source which is industrial categories listed in the h will potentially emit 250 tons llutant regulated under the Clean ict or be located in an attainment	X
SKIP TOWNSEND DIVISI 11 16-22 36 1V. FACILITY CONTACT A NAME & TITLE (lost, fi		TRON INC	B. PHONE (area code & no.)	69
HOWARD MOLT PLAN STREET OF P.O.	T'MANAG	3 E R 3	1 2 7 3 5 1 1 3 4	
SOUTHOAK PAR S.CITY OF TOWN B. ELTY OF TOWN	KAVE	CSTATE D.ZIP	3 8	
VI. FACILITY LOCATION A. STREET; ROUTE NO. OR OTHER 5 6 6 Ø Ø s o u t h o a k p a r k	SECIFIC IDENTIF	ER		
C CITY OR TOWN		D.STATE E. ZIP	CODE F. COUNTY CODE	
6 B E D F O R D P A R K 15 14 EPA Form 3510-1 (6-80)	NUV I 9 1	980 1, 1 6, 8 6	5 3 8 Ø 3 1 cont	INUE ON REVERS

INTINUED FROM THE FRONT IF SIC CODES (4-digit; in order of priority)	
A.FIRST	B. SECOND
3 4 5 2 (specify) TUBULAR AND SOLID RIVETS	(specify)
C THIRD	D. FOURTH
specify)	(specify)
III. OPERATOR INFORMATION	4.53 - 16 (14 (14 (14 (14 (14 (14 (14 (14 (14 (14
ANAME	B is the name listed in little in the little
TOWNSEND DIVISION TEXTRO	N I N C
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer	box; if "Other", specify.) D. PHONE (area code & no.)
S = STATE D = OTHER (specify)	A 3 1 2 7 3 5 1 1 3 4
P = PRIVATE ELSTREET OR P.O. BOX	[15] [10] [10] [10] [10] [10] [10] [10] [10
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FICITY OR TOWN	G.STATE H. ZIP CODE IX. INDIAN LAND
B E D F O R D P A R K	I L 6 9 6 3 8 Listbe facility-located on Indian lands?
	40 41 42 47 51 5L
The same of the sa	rom Proposed Sources)
B. UIC (Underground Injection of Fluids) 30 75 15 17 18 E. OTHER	(specify)
B Ø 1 7 9	4 SPREENOIS E P A HB 453
C'RCRA (Hazardous Wastes)	
16 17 An 18 18 18 17 18	(specify)
MAP	
Attach to this application a topographic map of the area extending to he outline of the facility, the location of each of its existing and pri	
reatment, storage, or disposal facilities, and each well where it inject vater bodies in the map area. See instructions for precise requirements	
II. NATURE OF BUSINESS (provide a brief description)	11. /30
MANUFACTURER OF TUBULAR AND SOLID RIVE	TS AND OTHER SPECIALTY COLD FORMED
PRODUCTS.	13, AND OTHER STEETAETT COLD TONIED
	Fa: A
	5)
HIVEERTHEICATION (see instruction)	
certify under penalty of law that I have personally examined and an	n familiar with the information submitted in this application and all
ittachments and that, based on my inquiry of those persons imme application, I believe that the information is true, accurate and comp	diately responsible for obtaining the information contained in the
alse information, including the possibility of fine and imprisonment. NAME & OFFICIAL TITLE (type or print) B. SIGNATA	IC. DATE SIGNED
	awards Malf 11-19-80
DMMENTS FOR OFFICIAL USE ONLY	www.
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IIII—III dieds die spaceu tui ente type, i.e., i.e viidiaute	VIRONMENTAL PROTECT	TION ACENCY	To the Land State of the State	
FORM A LDA HAZARD	IS WASTE PERMIT	APPLICATION :	I, EPA I.D. NUMBER	I TAE
RCRA (This inform.	Consolidated Permits Pro ation is required under Secti		F 1 L D 0 4 2 8 4 3 8	15 4 5 1
FOR OFFICIAL USE ONLY				
APPRICATION DATE RECEIVED APPROVED (yr. mo. & day)	11 .	COMMENTS		
		10 m		
II. FIRST OR REVISED APPLICATION	and the second of the second	property and a property of		
Place an "X" in the appropriate box in A or B below revised application. If this is your first application an EPA I.D. Number in Item I above.	<i>(mark one box only)</i> to indi d you already know your fa	cate whether this is the first a cility's EPA I.D. Number, or	application you are submitting for your if this is a revised application, enter you	r facility or a our facility's
A. FIRST APPLICATION (place an "X" below as	or definition of "existing" f		2.NEW FACILITY (Complete iten	
Complete item be	ILITIES, PROVIDE THE D I OR THE DATE CONSTRU	ATE (yr., mo., & day) JCTION COMMENCED	YR. MO. DAY (yr., mo., & TION BEG.	
B. REVISED APPLICATION (place an "X" belo		ve)	73 74 75 76 77 78 EXPECTED	TO BEGIN
72	DACITIES		72	
III. PROCESSES — CODES AND DESIGN CA	:		ha wood at the facility. Too lines and a	
A. PROCESS CODE — Enter the code from the list of entering codes. If more lines are needed, enter the describe the process (including its design capacity).	e code <i>(s)</i> in the space provid <i>J</i> in the space provided on the	ied. If a process will be used	that is not included in the list of codes	below, then
B. PROCESS DESIGN CAPACITY — For each code	entered in column A enter	the capacity of the process.		
AMOUNT — Enter the amount. UNIT OF MEASURE — For each amount enter measure used. Only the units of measure that			measure codes below that describes the	unit of
CESS MEAS	OPRIATE UNITS OF URE FOR PROCESS SIGN CAPACITY	PROCESS	PRO- APPROPRIATE U CESS MEASURE FOR P CODE DESIGN CAPA	PROCESS
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Disposal:		그는 그는 그 회학 위에 다른	METRIC TONS PE	
The state of the s			GALLONS PER HOU	
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III. PROCESSES (continued)

SPACE FOR ADDITIONAL PROCESS CODES OR DESCRIBING OTHER PROCESSES (code INCLUDE DESIGN CAPACITY.

.. FOR EACH PROCESS ENTERED HER

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- 3. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non—listed waste(s) that will be handled which possess that characteristic or contaminant.
- Codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDSP	KILOGRAMSK
	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hezardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B.C, and D by estimating the total annual
 quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTENO (enter code)	B. ESTIMATED ANNUAL SI QUANTITY OF WASTE	UNIT MEA- URE enter ode)	1. PROCES:	S CODES	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(I))
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X-3	$D \mid 0 \mid 0 \mid 1 \mid$	100	P	T 0 3 D 8 0		
X-4	$D \mid 0 \mid 0 \mid 2$		*:			included with above

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V. FACILITY DRAWING		led on page 5 a scale drawing of the facility (see in	estructions for more	lated I	F6: 1/55	
VI. PHOTOGRAPHS	clude in the space provid	led on page 3 a scale drawing of the facility (see II	istracachs for more a	ewny.	16 755	Jeen of
All existing facilities mus	t include photographs	s (aerial or ground—level) that clearly deline	eate all existing stru	ictures;	existing storage,	
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B. If the facility owner	。 1852 直接的原则。 1852 直接的原则。 1852 自然的原则。 1852 自然的原则。 1		The following terms.			
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P.O. BOX 8	378	G PROVIDENCE		RI	Ø 2 9 Ø	1 837
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IX. OWNER CERTIFICA					and all attack	
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GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1982.

GENERAL INSTRUCTIONS

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

The information requested in this report is required by Federal and State law.

Please print/type with elite type (12 characters pe	r inch)	,
. GENERATOR'S USEPA I.D. NUMBER	I.A. CENERATOR'S ILLIN	iois I.D. Number
ILD042043854	0316000561G	-
II. NAME OF INSTALLATION		
TOWNSEND/TEXTRON		
II. INSTALLATION MAILING ADDRESS		
6600 S. OAK PARK AVENUE		
Street or P.O. Box		······································
BEDFORD PARK,	ILLINOIS	60638
City or Town	State	Zip Code
IV. LOCATION OF INSTALLATION (if different tha	an section III above)	
Street or Route number		
		**
City or Town	State	Zip Code
V. INSTALLATION CONTACT	•	
WATERS, WILLIAM		
Name (last and first)		
·	·	
312/735-1134		
Phone No. (area code & no.)	V	
This Agency is authorized to require this information ur 1004 and 1021 (f)(2). Disclosure of this information is n \$25,000 for each day the failure continues, a fine up to \$ been approved by the Forms Management Center.	enuited failute to do so may result	I IN 9 CAN DEUTITA ND 10
VII. CERTIFICATION	•	
I certify under penalty of law that I have personally examined all attached documents, and that based on my inquitive information, I believe that the submitted information significant penalties for submitting false information, incl.	iry of those individuals immediately f in is true, accurate, and complete. I	esponsible for obtaining am aware that there are
William Waters Plant Engineer	Min Mit	2/24/82
	ature of Authorized Representative	Date Signed

PAGE 00/ OF 005

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (CONE.)

This report is for the calendar year ending December 11, 1982

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••	ENTIFICATION	11800 Street (P.O. Box)				Chicago. I) y State E.	60617 Zip
A. B. LINE NO.	DESCRIPTION OF WASTE		t USDOI		ZARDOUS E NO. ructions)	AMOUNT OF WASTE (gallons only)	DENSITY (lbs. / gal.)
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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY GENERATOR ANNUAL HAZARDOUS WASTE REPORT (CONL)

This report is for the calendar year ending December 31, 1982.

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FOR AGENCY USE LIP HIWIC	TYPE 6	The second secon	
VII. GENERATOR'S USEPA I.D. NO.		ILLINOIS EPA I.D NO	
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X FACILITY'S ILLINOIS EPA I.D. NO.	XI. FACILITY'S NA	ME ADDRESS	
	Name REF	INERY PRODUCTS	Phone (312) 678-8262
101 31 11 21 81 51 01 21	4256 Wes	ley Terrace	Schiller Park Il. 60176
XII. WASTE IDENTIFICATION	Sueet (P.O. Box)		Cuy State Zip
A. B. DESCRIPTION WASTE		D. RCRA HAZAI WASTEN (see instruc	AMOUNT OF WASTE DENSITY (lbs. / gall)
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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (CORL)

This report is for the calendar year ending	
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XI. GENERATOR'S NAME / ADDRESS	-
Name TOWNSEND/TEXTRON .	Phone (312, 735-1134
6600 S. OAK PARK AVENUE BEDFORD PA	
Street (P.O. Box) XIV. LIST OF TRANSPORTATION SERVICES (HAULERS) USED:	ity State Zip
IA IB	C TRANSPORTER'S
LINE TRANSPORTER'S NAME / ADDRESS	USEPA LD. NO. ILLINOIS EPA LD. NO.
Q Q Q 1 Browning-Ferris 61 64 550 W. Lake St. Melrose Park, Il.	1 L D 0 9 7 1 7 7 5 0 5 0 1 0 7 0 3 0
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GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont)

This report is for the calendar year ending December 31 1982.

AIII. COMMENTS

With reference to the Degreaser Still Sludge shown on page 003 of this report. Our last sample of this oil waste, taken on 11/22/82, contained 95.3% oil and non volatile residue and 4.7% Vol. % recoverable solvent (analysis copy attached). We have notified Refinery Products of this, and they are applying for a Permit Change from Non Hazardous to Hazardous. A copy of their present Permit is attached.

Milliam E. Waters

PAGE 005



DETREX CHEMICAL INDUSTRIES, INC.

P.O. BOX 501, DETROIT, MICHIGAN 48232

TWX 810-243-4064 TWX 810-243-4065 AREA CODE 313 868-8600

DATE: December 8, 1982

SUBJECT: TOWNSEND/TEXTRON

BEDFORD PARK, IL Trichloroethylene

The sample taken from the still on 11/22/82 contains 95.3 wt.% oil and non-volatile residue. The recoverable solvent constituted approximately 4.7 vol.% recoverable solvent.



Environmental Protection Agency

2200 Churchill Road, Springfield, Illinois 627,06

2172782-6760

JANUARY 09, 1982
APPUICATION RECEIVED: 12/28/61
PERMIT NUMBER 993019-03120502
PERMIT ISSUED TO: JOHN VAN HOESEN
4256 WESLEY TERR

HASTE STREAM NUMBER 993019 PERMIT EXPIRES: 12/15/84

JOHN VAN HOESEN

4256 WESLEY TERR

SHILLER PARK

11 60176 SHILLER PARK

12 00176

MASTE NAME: LUBRICATING OILS WASTE CLASSIFICATION: POR-HAZARDOUS NOT SUNJECT TO FEE

PERMIT TO RECEIVE THE IMPLEATED WASTE IS GRANTED.

THIS PERMIT IS REALIED SUBJECT TO THE ATTACHED STANDARD CONDITIONS.

DISPUSAL SITE: SHILLER PEZREF PROD

TEPA STIE ". 0.: 03128502

ARREST VOLUME ANTHOMIZED: 6,000 GALLONS DISEUSITION OF MASTE:

5 Tu? = 60

ATTENTION: RAY BEZAK NASTE BEKERATOR: TURKSERO TEKTRON CO. 6000 S DEA PARK AVE CHICAGO . IL TEPA GENERATOR .D.: 03160005616

Rama t. Chatterved.

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RKC: UNF

CC:TOWNSEND TEXTROY CO. PERION: "

RAMA K. CHATURVEDI, P.E.

ANNAGER SPECIAL WASTE UNIT

PESIGUAL HAMAGEMENT SECTION

DIVISION OF LAMBANDISE POLLUTION CONTROL

JAN 15 ESS

IL 532-610 (PC 62 8 '81 '

TO BE COMPLETED BY WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760

 $\underbrace{\frac{0796898}{2793019}}_{\text{Authorization Number}}$

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TO BE COMPLETED BY WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706

(217) 782-6760

SPECIAL WASTE HAULING MANIFEST

Authorization Number	9	 3	0	6	2

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1PC 62 B/B)

TO BE COMPLETED BY WASTE GENERATOR

MENTS OR SPECIAL INSTRUCTIONS

STATE OF ILLINOIS

SPECIAL WASTE HAULING MANIFEST

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 9 1983 200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760

Authorization Number $\frac{922062}{12}$

OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

PART 6 - GENERATOR

TOWASSEND/TONTROW 664 Su Carle Proof 312735/134 03/60 Generator Number 24

(Company Name)

Address 5050 W. Lafe St. Mel Rose Park, 311 S.W.H. Registration Number 6 1 0 7 0 3 7

Haule Address Haule: Address Hauler Name EPA Number Phone Number DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE 0 3 1 6 0 0 5 1 Site Number 11700060847/ Phone Number Site Number Address Alternate (Facility Name) **EPA Number** City TO BE COMPLETED BY TLATING WASTLE WASTE GENERATOR THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW: 2006-F006 A A 38 8 POISON B OUANTITY OF WASTE DELIVERED: 0 30 0 0 2 CU. YDS. WEIGHT FOR I.E.P.A. USE MUST BE CONVERTED TO CU. YDS. OR GAL. WEIGHT FOR TONS (circle one) DOT. USE OTHER (Specify) __ OPEN TRUCK TANK TRUCK METHOD OF SHIPMENT (Circle One) THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION. IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P. HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION BY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE WASTE HAULER DATE: 03 04 83 DATE: 3/03/ 93 (Authorized Signature) HAZARDOUS WASTE SUBJECT TO FEE YES __ DISPOSAL, STORAGE, OR TREATMENT FACILITY OVE DESCRIBES WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE: DATE: 03/03/83

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

R 537 610 (PC 62 B/B1

TO BE COMPLETED BY WASTE GENERATOR

DISTRIBUTION: PART - 1 GENERATOR

REV. # 4

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760

<u>0679207</u>

Authorization Number 922062

SCHV	State	60638	4	120428438 EPA Number
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IPL 62 8 81 TO BE COMPLETED BY WASTE-GENERATOR

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760

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TO BE COMPLETED BY WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760 SPECIAL WASTE HAULING MANIFEST

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(Company Name)	711. 60632 State Zip	710042843859 EPA Number
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TO BE COMPLETED BY WASJE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706

(217) 782-6760

 $\underbrace{0679210}_{i}$ Authorization Number $\underbrace{993019}_{i3}$

SPECIAL WASTE HAULING MANIFEST

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Privilla Pacity Name) SHILLER FIRE City	4256 W131 Address		03/2850 39 Site Number 271200066528 EPA Number
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TO ME COMPLETED BY WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760 0679211

Authorization Number 922062

SPECIAL WASTE HAULING MANIFEST 6600 S. Oak Park 3/27351134 0316000561

Address Phone Number 112042843854 Whater ST MolROSE PK. S W H Registration Number Hauler Address Hauler Name EPA Number Phone Number DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE 03/6005/ 606/7 31264662027170060847 Site Number Address Alternate (Facility Name) EPA Number Phone Number State TO BE COMPLETED BY 11/WC WASTE PHASE: (Liquid, Gaseous, Solid) THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW. HAZARD CLASS 0 0 6 - 1 0 0 C QUANTITY OF WASTE DELIVERED 6 0 0 0 0 WEIGHT FOR I.E.P.A. USE MUST BE LBS WEIGHT FOR CONVERTED TO CU. YDS. OR GAL. TONS (circle one) DOT. USE OPEN TRUCK OTHER (Specify) _ (DRUMS, METHOD OF SHIPMENT (Circle One) THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.D. I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION WASTE HAULER MEREBY CENTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTURATION AS THE DATE: 1102183 (Authorized Signature) DISPOSAL, STORAGE, OR TREATMENT FACILITY* HAZARDOUS WASTE SUBJECT TO FEE YES. THE ABOVE-DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE. - DATE: 41 10 21 83 (Authorized Signature) COMMENTS OR SPECIAL INSTRUCTIONS: *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* OUTSIDE ILL NOIS: 800 / 424-8802 or 202 / 426-2675 IN ILLINOIS: 217 / 782-3637

DISTRIBUTION PART - 1 GENERATOR

PART - 2 IEPA

PART - 3 SITE

PART - 4 HAULER

PART - 5 IEPA

PART 6 - GENERATOR

A.4 Closure/Post-Closure



217/782-6761

CERTIFIED MAIL # <u>P13/9/9</u>

Refer to: ILD 042843854 .

Compliance Inquiry Letter

April 16, 1985

Townsend Textron
Attn: Edward F. Marinier
6600 South Oak Park Avenue
Chicago, Illinois 60638

Gentlemen:

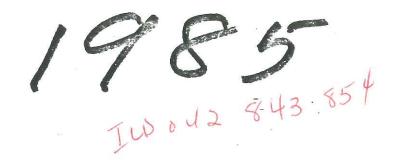
As Manager of the Compliance Assurance Unit for the Division of Land Pollution Control, it has come to my attention that your company may be in violation of the Illinois Environmental Protection Act or regulations adopted thereunder. More particularly, your company may not have complied with the 1984 Annual Hazardous Waste Reporting requirement of the State of Illinois for generators and/or treatment, storage, and disposal facilities.

The Illinois Environmental Protection Act states that:

"Conduct any process or engage in any act which produces hazardous waste in violation of any regulations or standards adopted by the Board under subsections (a) and (c) of Section 22.4 of this Act." Ill. Rev. Stat. 1983, Ch. 111 1/2 par. 1021(1)

"No person shall dispose, treat, store, or abandon any waste, or transport any waste into this State for disposal, treatment, storage, or abandonment, except at a site or facility which meets the requirements of this Act and of regulations and standards thereunder. . " Ill. Rev. Stat. 1983, Ch. 111 1/2, Par. 1021(e).

35 Ill. Adm. Code 722.141 requires a generator who ships his hazardous waste off-site to submit Annual Reports to the Director of this Agency no later than March 1 for the preceding calendar year. 35 Ill. Adm. Code 725.175 requires the owners or operators of hazardous waste treatment, storage, and disposal facilities to prepare and submit an annual report to the Director of this Agency by March 1 of each year; the annual report must cover facility activities during the previous calendar year.





Page 2

Non-compliance with the annual reporting requirements of 35 Ill. Adm. Codes 722.141 and/or 725.175 could be a violation of Ill. Rev. Stat. 1983, Ch. 111 1/2, pars. 1021(e), (f), or (i). Please note that the maximum civil penalty for such violations is set forth in Ill. Rev. Stat. 1983, Ch. 111 1/2, par. 1042(b)(3), which provides for a civil penalty not to exceed \$25,000 per day of violation. Also, the Environmental Protection Act provides for criminal fines and imprisonment as set forth in Ill. Rev. Stat. 1983, Ch. 111 1/2. Par. 1044.

The Illinois Annual Hazardous Waste Reporting requirements are designed to inventory hazardous waste generated, treated, stored, and disposed in Illinois. Because of the environmental importance of this program, any violation of the Annual Hazardous Waste Reporting system is reviewed with considerable concern. Our records indicate that on or about February 1, 1985 the Agency mailed copies of instruction booklets and blank forms to your company. The deadline for reporting was March 1, 1985 and to date no report has been received from your company.

Within 15 days of the date of this letter please respond to the undersigned in writing explaining the reason for the delay, along with your completed 1984 Annual Hazardous Waste Report(s). Failure to respond will result in your being requested to attend a compliance conference at our Springfield Office.

In addition, please be advised that this letter constitutes the notice required by Section 31(d) of the Illinois Environmental Protection Act prior to the filing of a formal complaint. The cited Section of the Illinois Environmental Protection Act requires the Agency to inform you of the charges which are to be alleged and offer you the opportunity to meet with appropriate officials within thirty days of this notice date in an effort to resolve such conflicts which could lead to the filing of a formal action.

If you have any questions concerning this letter, please contact the undersigned at this Agency's address or telephone number listed above.

11-23 171 Finally, this Agency expects your facility to insure that future violations will not occur.

Sincerely.

Gregory T. Zak, Manager Compliance Assurance Unit Compliance Monitoring Section

Division of Land Pollution Control

GTZ:HW:ds:0758E/0759E

Enclosure

cc: Division File Regional Office Regional Attorney

530 West Street Braintree, MA 02184 617/848-3500

May 3, 1985

Gregory T. Zak, Manager Compliance Assurance Unit Illinois Environmental Protection Agency 2200 Churchill Road Springfield, Illinois 62706

Dear Mr. Zak:

I write you this letter as you requested, and as a result of our phone conversation on May 1, 1985.

The operation at 6600 South Oak Park Avenue, Chicago, has been completely shut down and relocated to Canada and to Braintree, Massachusetts, as I indicated to you. I now understand that you need the Generator Annual Hazardous Waste Report for 1984 to close your files on this operation's activities.

We have been able to locate the engineering files and have retained one of the former employees in Chicago, and will have him construct this report for your office.

I ask your patience, as he must travel to Massachusetts and temporarily relocate here to do that. We feel this should happen within the next thirty days.

If I see that this will not be possible, I will call you and in turn, if this raises any questions, you can call me at this location.

Sincerely,

Dale M. Barnard General Manager

Townsend Fastening Systems

Townsend/Textron

DMB:ao'b

TOWNSEND TEXTRON

Townsend Fastening Systems
Townsend Division of Textron Inc.

530 West Street Braintree, MA 02184 617/848-3500

May 14, 1985

Gregory T. Zak, Manager Compliance Assurance Unit Illinois Environmental Protection Agency 2200 Churchill Road Springfield, Illinois 62706

Dear Mr. Zak:

Enclosed are the Annual Hazardous Waste Reports for the year 1984. As stated in Mr. Dale Barnard's letter of 5/3/85, the operation at 6600 S. Oak Park Ave., Chicago, has been shut down as of December 1984 and will no longer be a generator of hazardous wastes.

Please note that there's a conflict of Illinois E.P.A. Generators I.D. numbers 0316000561 and 0316640010. If this number had been changed, our file had no record of it. Because of this, we are enclosing copies of the Manifests for each waste shipment that was made in 1984.

Also enclosed, please find Illinois Manifests 1148563 and 1245571, that are for the last of the hazardous wastes from this facility, and were made in 1985.

We regret the delay in submitting these reports and hope this information will enable you to close your files on this operation.

Sincerely,

William E. Waters

Plant Engineer

WEW/rj

Enclosures

TOWNSEND TEXTRON

Malcolm M. Wilson Executive Vice President

Townsend Division of Textron Inc.

5250 77 Center Drive - Suite 300 Charlotte, NC 28210 704/525-8003

December 19, 1985

American National Bank & Trust Co. Of Chicago, As Trustee Under Trust Agreement Dated Dec. 6, 1985 And Known As Trust No. 66198 30 North LaSalle Street Chicago, IL 60602

Gentlemen:

All physical hazardous waste has been removed from the property at 6600 South Oak Park Avenue and disposed of with manifests supplied to Illinois E.P.A. We are not aware of any ongoing problems that remain on the property.

We still have under discussion a Compliance Inquiry Letter from the Illinois E.P.A. concerning "apparent violations" of Permit 0316640010. However, we are in continuing conversation with the U.S. E.P.A. which is recommending to the Illinois E.P.A. that a temporary Hazardous Waste Storage Permit filed in 1982 and never used or needed should be cancelled, thus eliminating the paperwork filing of an additional closure plan since the plating line was closed in July of 1984, and the plant has since been closed entirely.

We feel that the attached copy of the letter of May 14, 1985 to the Illinois E. P. A. will prove to be adequate as a document to close the Chicago E. P. A. files on Townsend.

Very truly yours,

M. M. Wilson

MMW:dk

Attachment

cc: Mr. M. Hornbrook - W/Attach.

Mr. M. Cahn

11

Mr. D. Barnard

11

cc: DMB.

TOWNSEND TEXTRON

Townsend Fastening Systems
Townsend Division of Textron Inc.

530 West Street Braintree, MA 02184 617/848-3500

May 14, 1985

Gregory T. Zak, Manager Compliance Assurance Unit Illinois Environmental Protection Agency 2200 Churchill Road Springfield, Illinois 62706

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Sincerely,

William E. Waters

Plant Engineer

WEW/rj

Enclosures

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REVIETS

GENERATOR COPY = PART 3- DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

GENERATOR COPY = PART 3- DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

The Acercy is authorized to require pursuant to Beroon Removed Statutes 1983. Chapter 111/s Section 21 that the information be submitted to the Agency Faulte to provide the information may result in a civil penalty agents! the owner or operator of not be exceed \$25,000 per day of violation Establishment may result in a time up to \$50,000 per day of violation and improvement up to 5 years. This form has been approved by the Forms Management Center.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY SENERATOR ANNUAL HAZARDOUS WASTE REPORT

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312-735-1135

VIII. INSTALLATION CONTACT WATERS, WILLIAM

Phone No. (area code & no.) This Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter III-1/2, Sections 1004 and 1021 (fx2). Disclosure of this information is required Failure to do so may result in a civil penalty up to 525,000 for each day the failure continues, a fine up to \$1,000,000.00 and imprisonment up to 5 years. This form has been approved by the forms Management Center.

IX. CERTIFICATION I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information. Thelieve that the submitted information is true, accurate and complete. Lam aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

WILLIAM WATERS	PLANT	ENGINEER /Williams	Meter 5116/8
Print Type Name	Titke	Signature of Authorized Representative	Date Signed

Organic Chemicals

K009 K010 K011 K013	Distillation bottoms from the production of acetaldehyde from ethylene. Distillation side cuts from the production of acetaldehyde from ethylene. Bottom stream from the wastewater stripper in the production of acrylonitrile. Bottom stream from the acetontrile column in the production of acrylontrile. Bottoms from the acetontrile purification column in the production of acrylonitrile.	(T) (T) (R, T) (T) (T)
K015	Still bottoms from the distillation of benzyl chloride.	(T)
K016	Heavy ends or distillation residues from the production of carbon tetrachloride. Heavy ends (still bottoms) from the purification column in the production of	(T) (T)
K018	epichlorohydrin. Heavy ends from the fractionation column in ethyl chloride production. Heavy ends from the distillation of ethylene dichloride in ethylene dichloride production.	(T)
K020	Heavy ends from the distillation of vinyl chloride in vinyl chloride monomer pro-	(T)
K021	Aqueous spent antimony catalyst waste from fluoromethanes production.	(T) (T)
K022	Distillation bottom tars from the production of phenol/acetone from cumene. Distillation light ends from the production of phthalic anhydride from naphthalene.	(T)
K024	Distillation bottoms from the production of phthalic anhydride from	(T)
К093	Distillation light ends from the production of phthalic anhydride from ortho- xylene.	(T)
K094	Distillation bottoms from the production of phthalic anhydride from ortho- zylene.	(T)
K025	Distillation bottoms from the production of nitrobenzene by the nitration of benzene.	(T)
K026	Stripping still tails from the production of methyl ethyl pyridines.	(T) (R, T)
K027 K028	Centrifuge and distillation residues from toluene diisocyanate production. Spent catalyst from the hydrochlorinator reactor in the production of 1,1,1	(T)
K029	trichloroethane. Waste from the product stream stripper in the production of 1,1,1-	(T)
K095	trichloroethane. Distillation bottoms from the production of 1,1,1-trichloroethane.	(T)
K096	Heavy ends from the heavy ends column from the production of 1,1,1- trichloroethane.	(T)
K030	Column bottoms or heavy ends from the combined production of trichloroethylene and perchloroethylene.	(T) (T)
K083 K103	Distillation bottoms from aniline production. Process residues from aniline extraction from the production of aniline.	(T)
K104	Combined wastewater streams generated from nitrobenzene/aniline production.	(T)
K085	Distillation or fractionation column bottoms from the production of chlorobenzenes.	(T)
K105	Separated aqueous stream from the reactor product washing step in the produc- tion of chlorobenzenes.	(T)
Inorganic Chemicals:		
K071	Brine purification muds from the mercury cell process in chlorine production, where separately prepurified brine is not used.	(T)
К073	Chlorinated hydrocarbon waste from the purification step of the diaphragm cell	(T)
K106	Wastewater treatment sludge from the mercury cell process in chlorine produc- tion.	(T)
Pesticides:		
K031	By-product salts generated in the production of MSMA and cacodylic acid.	(T)
K032 K033	Wastewater treatment sludge from the production of chlordane. Wastewater and scrub water from the chlorination of cyclopentadiene in the production of chlordane.	(T) (T)
K034	Filter solids from the filtration of hexachlorocyclopentadiene in the production of	(T)
ко97	chlordane. Vacuum stripper discharge from the chlordane chlorinstor in the production of	(T)
K035	chlordane. Wastewater treatment sludges generated in the production of creosote. Still bottoms from toluene reclamation distillation in the production of disulfoton.	(T) (T)

¥ 027	Wastewater treatment sludges from the production of disulfoton.	(T)
K037 K038	We stawates from the weshing and stripping of phorate production.	(T) (T)
K039	Filter cake from the filtration of diethylphosphorodithioic acid in the production	(1)
•••	of phorate.	(T)
K040	Wastewater treatment sludge from the production of phorate. Wastewater treatment sludge from the production of toxaphene.	(T)
K041	transport mantenation the production of Loxappene.	(T)
K098	Heavy ends or distillation residues from the distillation of tetrachlorobenzene in	(T)
K042	the production of 2.4.5.T.	
K043	2.6.Thichlorophenol waste from the production of 2.5.D.	(T)
K099	Untrested wastewater from the production of 2.4-D.	(T)
Explosives:		
К044	Wastewater treatment sludges from the manufacturing and processing of explosives	(R)
K045	Great sealer from the treatment of wastewater containing explosives.	(TC)
K046	Wastewater treatment sludges from the manufacturing, formulation and loading	(1)
	of lead-based initiating compounds.	(IR)
K047	Pink/red water from TNT operations.	4.
Petroleum Refining:		mme\
K048	Dissolved air flotation (DAF) float from the petroleum refining industry.	(T)
K049	Circuit and the molide from the netroleum religing inquality.	(T)
K050	Wast exchanger hundle cleaning sludge from the petroleum relining industry.	(T)
K051	ADI consector sludge from the petroleum relining inquatry.	(T)
K052	Tank bottoms (leaded) from the petroleum refining industry.	
- 10. 1.		•
Iron and Steel:	and the standing planting fur.	(T)
K061	Emission control dust/sludge from the primary production of steel in electric fur- naces. Spent pickle liquor from steel finishing operations.	(C, T)
K062	Spent pickle inquor from steel filmshing operations.	
Secondary Lead:		(T)
K069	Emission control dust/sludge from secondary lead smelting.	(T)
K100	Waste leaching solution from acid leaching of emission control dust/sludge from	(4)
1	secondary lead smelting.	
Veterinary Pharmaceuticals:		(T)
K084	Wastewater treatment sludges generated during the production of veterinary	(1)
	pharmaceuticals from arsenic or organo-arsenic compounds. Distillation tar residues from the distillation of aniline-based compounds in the	(T)
K101	production of veterinary pharmaceuticals from arsenic or organo-arsenic com-	
K102	pounds. Residue from use of activated carbon for decolorization in the production of	(T)
11.102	veterinary pharmaceuticals from arsenic or organo-arsenic compounds.	
Ink Formulation:		(T)
K086	Solvent washes and sludges, casutic washes and sludges, or water washes and sludges from cleaning tubs and equipment used in the formulation of ink from pigments, driers, soaps and stabilizers containing chromium and lead.	
Coking:		
	Ammonia still lime sludge from coking operations.	(T)
K060	Decanter tank tar sludge from coking operations.	(T)
K087	Phonus	



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY GENERATOR ANNUAL HAZARDOUS WASTE REPORT This report is for the calendar year ending December 31, 1984 (cont.)

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XIII. FACILIT	Y'S ILLINOIS EPA I.D. NO. XIV. FACILITY'S NA	ME / /	
01311	1 8 6 0 3 1 DETREX	CHE	MICAL Phone: 312 345 3806
	IDENTIFICATION 2537 L	EMOY)	City State Zip
A. LINE NO.	B. DESCRIPTION OF WASTE	C USDOT Hazard Code	D. RCRA HAZARDOUS WASTE NO. (gallons only: F. DENSITY (lbs. gal.)
0 0 0 1 63 66	TRICHLOREYTHENE WASTE LIQUID CRM-A- R/Q 4/10/84	1 67 6 8	F 0 0 1
0 0 0 2 63 66		67 68	F; 0; 0; 1
0 0 0 3 63 66	SAME AS LINE 0001 6/04/84	67 68	F: 0: 0: 1
0 0 0 4 63 66	SAME AS LINE 0001 7/02/84	67 6B	F 0 0 1
0 0 0 5 63 66	SAME AS LINE 0001 10/05/84	<u> </u> 67 68	F:0:0:1
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0 0 0 7 63 66		67 68	69 72 73 76 1 1 95 93 94 96 77 80 81 84
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0 0 0 9 63 66		<u>[</u> 67 68	69 72 73 76 85 93 94 96 77 80 81 84
0 0 1 0 63 66		 67 68	69 72 73 76 93 94 96 77 80 81 84
			VAUL DACE NU INARED

Table 1. — CONCENTRATION OF CONTAMINANTS FOR CHARACTERISTICS OF EP TOXICITY

EPA Hazardous Waste		Concentration
Number	Contaminant	(mg/l)
D004	Arsenic	5.0
D005	Barium	100.0
D 006	Cadmium	1.0
D0 07	Chromium	5.0
D008	Lead	5.0
D 009	Mercury	0.2
D010	Selenium	1.0
D011	Silver	8.0
D012	Endrin (1,2,3,4,10,10- hexachloro- 1,7-epoxy- 1,4,4a,5,6,7,8,8a- octahydro-1,4-endo, endo-5, 8-dimethano naphthalene	0.02
0013	Lindane (1,2,3,4,5,6- hexachlorocyclo- hexane.gamma isomer)	0.6
D014	Methoxychlor (1,1,1- Trichloro-2,2-bis [p-methoxyphenyl] ethsne)	10.0
D015	Toxaphene (C ₁₀ H ₁₀ Cl ₈ . Technical chlorinated camphene. 67-69 percent chlorine)	0.5
D016	2,4,-D, (2,4- Dichlorophenoxyacetic acid)	10.0
D017	2,4,5-TP Silvex (2,4,5- Trichlorophenoxypro- pionic acid)	1.0

Source: Amended at 6 Ill. Reg. 4828, effective as noted in Section 700.106.

SUBPART D: LISTS OF HAZARDOUS WASTE

Section 721.130 General

- a) A solid waste is a hazardous waste if it is listed in this Subpart, unless it has been excluded from this list under Sections 720.120 and 720.122.
- b) The basis for listing the classes or types of wastes listed in this Subpart is indicated by employing one or more of the Hazard Codes:

Ignitable Waste	(1)
Corrosive Waste	(C)
Reactive Waste	(R)
EP Toxic Waste	(E)
Acute Hazardous Waste	(H)
Toxic Waste	(T)

Appendix VII identifies the constituent which caused the Administrator to list the waste as an EP Toxic Waste (E) or Toxic Waste (T) in Sections 721.131 and 721.132.

- c) Each hazardous waste listed in this Subpart is assigned an EPA Hazardous Waste Number which precedes the name of the waste. This number must be used in complying with the notification requirements of Section 3010 of the Act and certain recordkeeping and reporting requirements under Parts 722 through 725 and 40 CFR Part 122.
- d) The following hazardous wastes listed in Section 721.131 or 721.132 are subject to the exclusion limits for acutely hazardous wastes established in Section 721.105:

Section 721.131 Hazardous Wastes From Nonspecific Sources

Industry and EPA Hazardous Waste No.	Hazardous Waste	Hazard Code
Generic:		
P001	The following spent halogenated solvents used in decreasing tetrachloroethylene; trichloroethylene, methylene chloride, 1,1.1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons; and sludges from the recovery of these solvents in degreasing operations.	(T)
F002	The following spent halogenated solvents: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, orthodichlorobenzene, and trichlorofluoromethane; and the still bottoms from the recovery of these solvents.	(T)
P003	The following spent non-halogenated solvents: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol; and the still bottoms from the recovery of these solvents.	(I)
F004	The following spent non-halogenated solvents: cresols and cresplic acid, and nitrobenzene, and the still bottoms from the recovery of these solvents.	(T)
P005	The following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, and pyridine; and the still bottoms from the recovery of these solvents.	(I, T)
P006	Wastewater treatment sludges from electroplating operations except from the following processes: (1) sulfuric acid anodizing of aluminum; (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel; (4) aluminum or zinc-aluminum plating on carbon steel; (5) cleaning/stripping associated with tin, zinc and aluminum plating on carbon steel; and (6) chemical etching and milling of aluminum.	(T)
F019	Wastewater treatment sludges from the chemical conversion coating of aluminum.	(T)
F007	Spent cyanide plating bath solutions from electroplating operations (except for precious metals electroplating spent cyanide plating bath solutions).	(R, T)
F008	Plating bath sludges from the bottom of plating baths from electroplating opera- tions where cyanides are used in the process (except for precious metals electroplating plating bath sludges).	(R, T)
P009	Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process (except for precious metals electroplating spent stripping and cleaning bath solutions).	(R, T) ≈
P010	Quenching bath studge from oil baths from metal heat treating operations where cyanides are used in the process (except for precious metals heat-treating quenching bath sludges).	(R, T)
F011	Spent cyanide solutions from salt bath pot cleaning from metal heat treating operations (except for precious metals heat treating spent cyanide solutions from salt bath pot cleaning).	(R, T)
F012	Quenching wastewater treatment sludges from metal heat treating operations where cyanides are used in the process (except for precious metals heat treating quenching wastewater treatment sludges).	(T)
Section 721.132 Hazardous V	Vaste from Specific Sources	
Wood Preservation:		
K001	Bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol.	(T)
Inorganic Pigments:		· ,
K002	Wastewater treatment sludge from the production of chrome yellow and orange	(T)
K003	pigments. Wastewater treatment sludge from the production of molybdate orange pig-	(T)
K004	ments. Wastewater treatment sludge from the production of zinc yellow pigments.	(T)
K005	Wastewater treatment sludge from the production of chrome green pigments. Wastewater treatment sludge from the production of chrome oxide green pigments (anhydrous and hydrated).	(T) (T)
K007 K008	Wastewater treatment sludge from the production of iron blue pigments. Oven residue from the production of chrome oxide green pigments.	(T) (T)

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY GENERATOR ANNUAL HAZARDOUS WASTE REPORT This report is for the calendar year ending December 31, 1984 (cont.)

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FOR AC	GENCY USE LEIP HIWIC	CARD TYPE	5 0	TR/ CO		DATE ENTERED		<u> </u>	.
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63 66				67 6B	69 72 77 80	<u></u>	95 -	93	94 96
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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY GENERATOR ANNUAL HAZARDOUS WASTE REPORT This report is for the calendar year ending December 31, 1984 (cont.)

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FOR AC	GENCY USE LE PHINIC CARD 5101 TYPE 67	TRANS (A)	DATE ENTERED	<u>اا/اا</u>	J
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<u>(0 3 1 </u>	1 1 1 0 0 0 1 Name: ENVIR	RITE CORP.		Phone: 312 :59	6 -7040
.,		CENTER AVE.	HARV City	VEY IL State	60426 Zm
A. LINE NO.	B. DESCRIPTION OF WASTE		AZARDOUS ITE NO. structions)	AMOUNT OF WASTE (gallons only)	F. DENSITY (lbs. gal.)
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10 10 12 63 6 6	SAME AS ABOVE 10/03/84	F 0 0 7 69 72 67 68 1 1 1 77 80	B5	1	18] . [4 94 96
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		69 77 67 68 77 80	73 76 85 81 84	93	94 96
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63 6 6		69 72 67 68 1 1 77 80 8	73 76 1 85	93 9	
63 66		69 72 67 68 77 80 I	B5	93 9	J . L 4 96
63 66		69 72 3 67 68	73 76 85	93 5)4 96
	Louis Manager			XVII. PAGE	NUMBER

Appendix

Characteristics of Hazardous Wastes

(Section 721, Subpart C)

and

Lists of Hazardous Waste

(Section 721, Subpart D)

SUBPART C: CHARACTERISTICS OF HAZARDOUS WASTE

Section 721.120 General

a) A solid waste, as defined in Section 721.102, which is not excluded from regulation as a hazardous waste under Section 721.104(b), is a hazardous waste if it exhibits any of the characteristics identified in this Subpart.

Comment: Section 722.111 sets forth the generator's responsibility to determine whether his waste exhibits one or more of the characteristics identified in this Subpart.

- b) A hazardous waste which is identified by a characteristic in this Subpart, but is not listed as a hazardous waste in Subpart D, is assigned the EPA Hazardous Waste Number set forth in the respective characteristic in this Subpart. This number must be used in complying with the notification requirements of Section 3010 of the Act and certain recordkeeping and reporting requirements under Parts 722 through 725 and 40 CFR Part 122.
- c) For purposes of this Subpart, a sample obtained using any of the applicable sampling methods specified in Appendix I is a representaive sample within the meaning of Part 720.

Comment: Since the Appendix I sampling methods are not being formally adopted, a person who desires to employ an alternative sampling method is not required to demonstrate the equivalency of his method under the procedures set forth in Section 720.121.

Source: Amended at 6 Ill. Reg. 4828, effective as noted in Section 700.106.

Section 721.121 Characteristic of Ignitability

- a) A solid waste exhibits the characteristic of ignitability if a representative sample of the waste has any of the following properties:
 - 1) It is a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume, and has a flash point less than 60°C (140°F), as determined by Pensky-Martens Closed Cup Tester, using the test method specified in the American Society of Testing Materials (ASTM) Standard D-93-79 or D-93-80 (incorporated by reference, see Section 720.111), or a Setaflash Closed Cup Tester, using the test method specified in ASTM Standard D-3276-78 (incorporated by reference, see Section 720.111), or as determined by an equivalent test method approved by the Board (Section 720.120).
 - 2) It is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard.
 - 8) It is an ignitable compressed gas as defined in 49 CFR 173.300 and as determined by the test methods described in that regulation or equivalent test methods approved by the Board (Section 720.120).
 - 4) It is an oxidizer as defined in 49 CFR 173.151.
- b) A solid waste that exhibits the characteristic of ignitability, but is not listed as a hazardous waste in Subpart D, has the EPA Hazardous Waste Number of D001.

Source: Amended at 6 Ill. Reg. 4828, effective as noted in Section 700.106.

Section 721.122 Characteristic of Corrosivity

- a) A solid waste exhibits the characteristic of corrosivity if a representative sample of the waste has either of the following properties:
 - It is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5, as determined by a pH meter using either an EPA test method or an equivalent test method (Section 720.121). The EPA test method for pH is specified as Method 5.2 in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods" (incorporated by reference, see Section 720.111).
 - 2) It is a liquid and corrodes steel (SAE 1020) at a rate greater than 6.35 mm (0.250 inch) per year at a test temperature of 55°C (130°F) as determined by the test method specified in NACE (National Association of Corrosion Engineers) Standard TM-01-69 as standardized in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods" (incorporated by reference, see Section 720.111) or an equivalent test method (Section 720.121).
- b) A solid waste that exhibits the characteristic of corrosivity, but is not listed as a hazardous waste in Subpart D, has the EPA Hazardous Waste Number of D002.

Source: Amended at 6 Ill. Reg. 4828, effective as noted in Section 700.106.

Section 721.123 Characteristic of Reactivity

- a) A solid waste exhibits the characteristic of reactivity if a representative sample of the waste has any of the following properties:
 - It is normally unstable and readily undergoes violent change without detonating.
 - 2) It reacts violently with water.
 - 3) It forms potentially explosive mixtures with water.
 - When mixed with water, it generates toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment.
 - 5) It is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5 can generate toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment.
 - 6) It is capable of detonation of explosive reaction if it is subjected to a strong initiating source or if heated under confinement.
 - It is readily capable of detonation of explosive decomposition or reaction at standard temperature and pressure.
 - 8) It is a forbidden explosive as defined in 49 CFR 173.51, or a Class A explosive as defined in 49 CFR 173.53 or a Class B explosive as defined in 49 CFR 173.88.
- b) A solid waste that exhibits the characteristic of reactivity, but is not listed as a hazardous waste in Subpart D, has the EPA Hazardous Waste Number of D003.

Source: Amended at 6 Ill. Reg. 4828, effective as noted in Section 700.106.

Section 721.124 Characteristic of EP Toxicity

- a) A solid waste exhibits the characteristic of EP toxicity if, using the test methods described in Appendix II or equivalent methods (Section 720.121), the extract from a representative sample of the waste contains any of the contaminants listed in Table I at a concentration equal to or greater than the respective value given in that Table. Where the waste contains less than 0.5 percent filterable solids, the waste itself, after filtering, is considered to be the extract for the purposes of this Section.
- b) A solid waste that exhibits the characteristic of EP toxity, but is not listed as a hazardous waste in Subpart D, has the EPA Hazardous Waste Number specified in Table I which corresponds to the toxic contaminant causing it to be hazardous.

60 GENERATOR ANNUAL HAZARDOUS WASTE REPORT This report is for calendar year ending December 3.1, 4983 (cont.)



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Name					**	(0()0
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41 44				45	56	57 60

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TO SE COMPLETED BY WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706

(217) 782-6760

SPECIAL WASTE HAULING MANIFEST

 $\underbrace{0679213}_{\text{p}}$ Authorization humber $\underbrace{922062}_{\text{13}}$

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HEREBY AGREE TO AND CERTIFY THE ABOVE WRIT	TEN INFORMATION	(Authorized Signature)	DATE
WASTE HAULER I HEREBY CERTIFY THAT THE DESTINATION AS IN	THE ABOVE-DESCRIBED WASTE AND OBANTITY DICATED	HAS BEEN ACCEPTED IN PROPER CONDITIO	
Michael VIII	Geman		DATE
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ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760 SPECIAL WASTE HAULING MANIFEST

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ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760

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Authorization Number 922062

SPECIAL WASTE HAULING MANIFEST TI-STRUN 6640 S. Oak Back 3127551134 0316000561 5050 W. Loke St. Hickory PKs W H Registration Number 0107037 3123457080 1209717750S Haule: Address Hauler Name EPA Number Phone Number DESTINATION - DISPOSAL STORAGE OF TREATMENT SITE 03/6008/ STONE 3174416202 11700 0608471 Site Number Atternate (Facility Name) Phone Number Cnv TO BE COMPLETED BY WASTE WASTE PHASE _ WASTE GENERATOR THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW HAZARD CLASS NA 91 8 2 SHIPPING DESCRIPTION. QUANTITY OF WASTE DELIVERED 0 0300 WEIGHT FOR LE P.A. USE MUST BE CONVERTED TO CU YDS OR GAL. WEIGHT FOR TONS (circle one) DOT. USE DTHER (Specify) _ DPEN TRUCK CANK TRUCK METHOD OF SHIPMENT (Circle One) THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS 15 PROPER CONDITION FOR TRANSPORTATION IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND LE P.A. I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE WASTE HAULER THE DESTINATION AS INDICATED DATE 0 \$ 031 84 (Authorized Signature) HAZARDOUS WASTE SUBJECT TO FEE YES L DISPOSAL, STORAGE, OR TREATMENT FACILITY" THAT THE ABOVE-DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE: DATE: 041 03184 (Authorized Signature) COMMENTS OR SPECIAL INSTRUCTIONS: DUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2 *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* PART 6 - GENERATOR PART - 5 IEPA IN ILLINOIS 217 / 782-3637 PART - 4 HAULER PART - 3 SITE

TO BE COMPLETED BY WASTE GENERATOR

DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706

Authorization Number 932063

(217) 782-6760 SPECIAL WASTE HAULING MANIFEST

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TO BE COMPTETED BY WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760 SPECIAL WASTE HAULING MANIFEST

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(Company Name)	<u> </u>		2	1204284385 EPA Number
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10 BE COMPLETED BY WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760 SPECIAL WASTE HAULING MANIFEST

Authorization Number 222042

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			Rockunds .	EPA Number
Very - CLONR (Facility Name)		ATION — DESPOSAL STORAGE TOMEY		03160081 See Humber
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STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706

(217) 782-6760

Authorization Number 2000

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STATE OF ILLINOIS <u>0679212</u> ENVIRONMENTAL PROTECTION AGENCY TOUSE COMPLETED BY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 Authorization Aumbe: 993019 (217) 782-6760 SPECIAL WASTE HAULING MANIFEST 6600 So. Oak Park 312731134 031600656 Address Address 1204284385 WASTE HAULER(S) S W H Registration Number 220400. 11209316149 124861818 Phone Number S W H Registration Number Hauler Address Haule: Rame EPA Numbe: Phone Number DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE Site Number Address Afternate (Facility Name) EPA Number Phone Number City TO BE COMPLETED BY DEGREASER STILL WASIL WASTE PHASE . THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW HAZARD CLASS: NA9189 QUANTITY OF WASTE DELIVERED. 2009 0 WEIGHT FOR I.E.P.A. USE MUST BE MEIGHT FOR CONVERTED TO CU. YDS OR GAL. TONS (circle one) DOT USE **OPEN TRUCK** OTHER (Specify) _ TANK TRUCK METHOD OF SHIPMENT (Circle One) Number THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION. IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P.A. DATE 1- 6-84 I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION (Authorized Signature) I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE WASTE HAULER JAN 13 1984 (Authorized Signature)

HAZARDOUS WASTE SUBJECT TO FEE DISPOSAL, STORAGE, OR TREATMENT FACILITY"

DATE: 0/106/1

RIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

I HEREBY

(Authorized Signature)

"24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS" OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2575

IN ILLINOIS: 217 / 782-3637 DISTRIBUTION PART - 1 GENERATOR

PART - 3 SITE PART - 2 IEPA

PART - 4 HAULER PART - 5 IEPA PART 6 - GENERATOR

GENERATOR COPY - PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

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PART - 3 SITE PART - 4 HAULER

PART - 2 IEPA

IN ILLINOIS: 217 / 782-3637

"24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS"

PART - 5 TEPA PART 6 - GENERATOR

DUTSIDE ILLINOIS 800 / 424-8802 or 202 / 426-2675

E 537 610 PC 62 B 81

TO BE COMPLETED BY WASTE SENERATOR ..

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760

<u>0679217</u>

SPECIAL WASTE HAULING MANIFEST

Authorization	Number	940151	
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-1720 660 So Onk Proce 03/600056 3/2735/134 Priore Number 11 DO 4284385 S W H Registration Number 22 Mauler Name Haure: Address FPA Sumber Phone Number DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE Site Number Address Anernate (Facility Name) EPA Number Phone Numbe State City TO BE COMPLETED BY TRICHLOROFTHYLENE WASTE GENERATOR WASTE PHASE: THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW HAZARD CLASS SHIPPING DESCRIPTION WEIGHT FOR I.E.P.A. USE MUST BE QUANTITY OF WASTE DELIVERED _ O O WEIGHT FOR CONVERTED TO CU YDS OR GAL S (circle one) D.D T USE **OPEN TRUCK** OTHER (Specify) _ (DRUMS. TANK TRUCK METHOD OF SHIPMENT (Circle One) THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P.A. I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION (Authorized Signature) 4 WASTE HAULER I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND LACKNOWLEDGE THE DESTINATION AS INDICATED DATE 05/07/ 84 (Authorized Signature) HAZARDOUS WASTE SUBJECT TO FEE YES. DISPOSAL STORAGE, OR TREATMENT FACILITY" D QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE: I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED DATE 057071 (Authorized Signature) COMMENTS OR SPECIAL INSTRUCTIONS: *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2575 IN ILLINOIS, 217 / 782-3637 PART 6 - GENERATOR PART - 4 HAULER PART - 5 IEPA PART - 3 SITE PART - 2 IEPA DISTRIBUTION PART - 1 GENERATOR

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ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 Authorization Number 24023 (217) 782-6760 SPECIAL WASTE HAULING MANIFEST 6600 S. On K. Proc. (3 12 7351 134 031600 050 Address . Phone Number 134 Generator Number 120042843854 S W H Registration Number 029700/ 31274538+C Nauler Address Marrier Barrie EPA Number Phone Number DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE 60160 3123 15380 6 16 D074424 Site Number Address Atternate (Facility Name) EPA Number Phone Number Criv TO BE COMPLETED BY WASTE NAME TRICHLORDETHILENE WASTE GENERATOR WASTE PHASE THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW HAZARD CLASS SHIPPING DESCRIPTION. UN or NA Number TRICHLOROFTHYLONG ORM-A QUANTITY OF WASTE DELIVERED 000, WEIGHT FOR 1.E.P.A. USE MUST BE CONVERTED TO CU. YDS. OR GAL. LBS TONS (circle one) OTHER (Specify) _ TANK TRUCK **DPEN TRUCK** METHOD OF SHIPMENT (Circle One) THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P.A. - I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION (Authorized Signature) I HEREBY CERTIFY THAT THE ABOVE DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE DATE 02/02/84 (Authorized Signature) HAZARDOUS WASTE SUBJECT TO FEE YES. DISPOSAL, STORAGE, OR TREATMENT FACILITY" I WEREBY CERTIFY THAT THE ABOVE DESCRIBED WASTE AND INDICATED QUANTITY AND BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE. COMMENTS OR SPECIAL INSTRUCTIONS: "24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS" OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675 IN ILLINDIS: 217 / 782-3637 PART - 5 IEPA PART - 2 IEPA PART - 3 SITE PART - 4 HAULER DISTRIBUTION PART - 1 GENERATOR GENERATOR COPY - PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

STATE OF ILLINOIS

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STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706

(217) 782-6760

Authorization Numbe

OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

SPECIAL WASTE HAULING MANIFEST 212735113Y WASTE HAULER(S) Hauler Address Hauler Name Phone Number DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE Site Number Address Atternate (Facility Name) Phone Number EPA Number Crty TO BE COMPLETED BY WASTE PHASE. WASTE GENERATOR WASTE NAME . THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW HAZARD CLASS Combusille NA1270 FPA HW Number GALLONS (Circle One QUANTITY OF WASTE DELIVERED 00 WEIGHT FOR I.E.P.A. USE MUST BE WEIGHT FOR CONVERTED TO CU. YDS. OR GAL. TONS (circle one) DO.T USE OPEN TRUCK OTHER (Specify) (DRUMS, METHOD OF SHIPMENT (Circle One) Number THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION. IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P.A. 6-6-84 I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION (Authorized Signature) I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE WASTE HAULER THE DESTINATION AS INDICATED DATE: 06/6/84 Authorized Signature) (Authorized Signature) HAZARDOUS WASTE SUBJECT TO FEE YES. DISPOSAL, STORAGE, OR TREATMENT FACILITY BOYE DESCRIBED WAS E AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE: (Authorized Signatu S OR SPECIAL INSTRUCTIONS: 24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

IN ILLINOIS 217 / 782-3637

PART - 3 SITE

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PART - 4 HAULER

PART - 5 IEPA

PART 6 - GENERATOR



217/782-6761

Certified # P 731 918 429

RECEIVED

Refer to:

0316640010 -- Cook County Chicago/Textron. Inc.

ILD042843854

COMPLIANCE INQUIRY LETTER

August 2, 1985

Mr. William J. Ledbetter Textron, Inc. 40 Westminster Street Providence, Rhode Island 02903

Dear Mr. Ledbetter:

AUG 0 6 1985

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code, Part 725 Subparts G and H and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations. The Agency's findings of apparent non-compliance listed in Attachment A are based on a July 8, 1985 review of documents submitted to the Agency to demonstrate compliance with the requirements of Subparts G and H.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations and a description of the steps which have been taken to correct the identified violations. The written response should be sent to the following:

> Mark A. Haney, Manager Facilities Compliance Unit Compliance Monitoring Section Illinois Environmental Protection Agency Division of Land Pollution Control 2200 Churchill Road Springfield, Illinois 62706

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.

got to Tom at Oct & It at 10:00Ah



Page 2

If you have any questions regarding the above, please contact Andy Vollmer at 217/782-9884.

Sincerely,

Mark A. Haney, Manager

Facilities Compliance Unit

Compliance Monitoring Section

Division of Land Pollution Control

MAH:MT:ba/1743e/29-30

cc: Division File Northern Region

Don Gimbel

Andy Vollmer

Michelle Tebrugge

call mark Haming and and mark



Attachment A

- 1. Pursuant to 35 III. Adm. Code 725.212(a), by May 19, 1981, the owner or operator must have a written closure plan. A copy of the closure plan and all revisions must be kept at the facility until closure is completed and certified. The closure plan must include at least:
 - A description of how and when the facility will be partially closed, if applicable, and finally closed. The plan must identify how the requirements of Sections 725.211, 725.213, 725.214 and 725.215 and applicable requirements of 725.297, 725.328, 725.380, 725.410, 725.451. 725.481 and 725.504 will be met;
 - An estimate of the maximum inventory of wastes in storage and in Ь. treatment at any time during the life of the facility;
 - A description of the steps needed to decontaminate facility equipment C. during closure;
 - An estimate of the expected year of closure and a schedule for final d. closure;
 - A provision for closure certification by an independent registered e. professional engineer.

You are in apparent violation of 35 Ill. Adm. Code 725.212(a) for the following reason(s): The closure plan as submitted fails to meet the requirements of all of the above.

- Pursuant to 35 Ill. Adm. Code 725.242(a), the owner or operator must prepare a written estimate, in current dollars, of the cost of closing the facility in accordance with the closure plan as specified in Section 725.212. You have failed to provide a closure cost estimate as required. The closure cost estimate must equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan. You are in apparent violation of 35 III. Adm. Code 725.242(a) for the following reason(s): Failure to submit a closure cost estimate as indicated by its closure plan.
- Pursuant to 40 CFR 265.143 (as incorporated by reference in 35 III. Adm. Code 725.243), an owner or operator of each facility must establish financial assurance for closure of the facility. You have failed to provide adequate documentation demonstrating compliance with this You are in apparent violation of 35 Ill. Adm. Code 725.243 for the following reason(s): The Financial Test for 1984 should list the amount of \$10,000 for financial assurance, at the Townsend Division facility, under closure, not post-closure.

Illinois forms are enclosed for your re-submission.

MAH:MT:ba/1743e/31

Enclosure



217/782-6761

Refer to: 0316640010 -- Cook County

Chicago/Textron, Inc. ILD042843854

PRE-ENFORCEMENT CONFERENCE LETTER

558 505 Certified # P 594

September 20, 1985

W. J. L

RECEIVED

1 T 0 1 1985

Mr. William J. Ledbetter Textron. Inc. 40 Westminister Street Providence, Rhode Island 02903

Dear Mr. Ledbetter:

The Agency has previously informed Textron, The. of apparent violations of the Illinois Environmental Protection Act and/or/rules and regulations adopted thereunder. These apparent violations are set forth in Attachment A of this letter.

As a result of these apparent violations, it is our intent to refer this matter to the Agency's legal staff for the preparation of a formal enforcement case. The Agency's legal staff will, in turn, refer this matter to the Office of Attorney General or to the United States Environmental Protection Agency for the filing of a formal complaint.

Prior to taking such action, however, you are requested to attend a Pre-Enforcement Conference to be held at the Division of Land Pollution Control, 2200 Churchill Road, Springfield, Illinois 62706. The purpose of this Conference will be:

- 1. To discuss the validity of the apparent violations noted by Agency staff, and
- To arrive at a program to eliminate existing and/or future violations.

You should, therefore, bring such personnel and records to the conference as will enable a complete discussion of the above items. We have scheduled the Conference for November 8, 1985, at 10:00 a.m. If this arrangement is inconvenient, please contact Andy Vollmer at 217/782-9884 to arrange for an alternative date and time.



Page 2

In addition, please be advised that this letter constitutes the notice required by Section 31(d) of the Illinois Environmental Protection Act prior to the filing of a formal complaint. The cited Section of the Illinois Environmental Protection Act requires the Agency to inform you of the charges which are to be alleged and offer you the opportunity to meet with appropriate officials within thirty days of this notice date in an effort to resolve such conflict which could lead to the filing of formal action.

Sincerely.

Michael F. Neghvatal, Manager Compliance Monitoring Section

Division of Land Pollution Control

MFN:MT:rd2066E/7-8

Attachment

cc: Division File Northern Region Don Gimbel Gary King Paul Jagiello Andy Vollmer Michelle Tebrugge



Attachment A

- 1. Pursuant to 35 Ill. Adm. Code 725.212(a), by May 19, 1981, the owner or operator must have a written closure plan. A copy of the closure plan and all revisions must be kept at the facility until closure is completed and certified. The closure plan must include at least:
 - a. A description of how and when the facility will be partially closed, if applicable, and finally closed. The plan must identify how the requirements of Sections 725.211, 725.213, 725.214 and 725.215 and applicable requirements of 725.297, 725.328, 725.380, 725.410, 725.451, 725.481 and 725.504 will be met;
 - b. An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility;
 - A description of the steps needed to decontaminate facility equipment during closure;
 - d. An estimate of the expected year of closure and a schedule for final closure:
 - e. A provision for closure certification by an independent registered professional engineer.

You are in apparent violation of 35 Ill. Adm. Code 725.212(a) for the following reason(s): The closure plan as submitted fails to meet the requirements of all of the above.

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- 3. Pursuant to 40 CFR 265.143 (as incorporated by reference in 35 Ill. Adm. Code 725.243), an owner or operator of each facility must establish financial assurance for closure of the facility. You have failed to provide adequate documentation demonstrating compliance with this section. You are in apparent violation of 35 Ill. Adm. Code 725.243 for the following reason(s): The Financial Test for 1984 should list the amount of \$10,000 for financial assurance, at the Townsend Division facility, under closure, not post-closure.

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ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6761

£532-0610 ·

LPC 62 8/81

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Textron Inc.

40 Westminster Street Providence, R.I. 02903 401/421-2800

August 13, 1985

Mark A. Haney, Manager Facilities Compliance Unit Compliance Monitoring Section Illinois Environmental Protection Agency Division of Land Pollution Control 2200 Churchill Road Springfield, IL 02706

Reference No.: 0316640010-Cook County

Chicago/Textron Inc.

ILD042843854

Dear Mr. Haney:

I spoke with Andy Vollmer today of your offices regarding this matter. I explained to Mr. Vollmer that Textron's attorney who handles the environmental matters is away from the office on Army Reserve Active Duty for two weeks and the plant manager for Townsend is away at a two week seminar. Based upon the foregoing, we are unable to prepare a response to your August 2, 1985 Compliance Inquiry Letter. I asked Mr. Vollmer to grant us a 3-4 week extension of time to prepare the appropriate response. Mr. Vollmer instructed me to prepare this letter, explaining the above facts and our intent to prepare and submit a response to your letter in 3-4 weeks.

If you have any questions regarding the above, please contact me.

Sincerely,

Susannah Hillery Blood **Product Liability Specialist**

SHB:dmp

bcc: Andrew C. Spacone - Corporate

Malcolm M. Wilson - Townsend Dale Barnard - Townsend/Braintree Don Stetson - Townsend/Braintree

Townsend Fastening Systems
Townsend Division of Textron I

1984

Illinois Environmental Protection Agency Division of Land Polution Control Permit Section - Financial Assurance 2200 Churchill Road Springfield, Illinois 62706

Attn: Mr. Andrew A. Vollmer

Re: Townsend Division of Textron Inc.

03166410 - Cook County - Chicago/Textron

ILD 042843854/Log #FA 129

Dear Mr. Vollmer:

Enclosed please find two copies of our current Closure Plan for the Chicago Facility of Townsend Division of Textron, Inc., as requested in your letter dated March 9, 1984 addressed to William J. Ledbetter of Textron.

Should you require any additional information regarding our Closure Plan, please contact me directly.

Very truly yours,

Townsend Division of Textron, Inc.

awardomall

Howard O. Molt Plant Manager

cc:Paul J. Bergman (w/Enclosure)
John Canty (w/Enclosure)

HOM:cz

CLOSURE PLAN

In the event of a plant closing, the following action is to be taken to insure all hazardous chemicals, solutions, containers and waste are properly disposed of prior to vacating the premises.

- Contact prospective reputable users of chemicals and plating solutions to 1. purchase saleable items.
- 2. Any purchased chemicals are to be pumped into and sealed into proper approved containers and shipped to buyer via reputable hauler.
- 3. All transactions of saleable items are to be documented as follows:

Chemical or solution type (if solution analysis)

Quantity of chemical or solution.

Type of container С.

d. Company or person sold to (Name, address, telephone number, permit #)

e. Hauler (Manifest)

- Date of transaction.
- Any non-saleable chemicals and solutions are to neutralized, if possible, pumped into holding tank analyzed and disposed of by a reputable hauler.
- All now empty tanks and containers are to be filled with water, again neutralized, drained (pump into holding tank) and rinsed.
- 6. All containers are to be properly disposed of.
- 7. All tanks, containers and equipment are to be inspected. No hazardous material is to remain on these premises if left unattended.

Textron Inc.

40 Westminster Street Providence, R.I. 02903 401/421-2800

March 30, 1984

Andrew A. Vollmer
Illinois Environmental Protection Agency
Division of Land Pollution Control
Permit Section-Financial Assurance
2200 Churchill Road
Springfield, IL 62706

Re: Townsend Division of Textron Inc.

03166410 - Cook County - Chicago/Textron

ILD 042843854/Log #FA 129

Dear Mr. Vollmer:

Thank you for your letter dated March 9, 1984 addressed to William J. Ledbetter of Textron. In compliance with the State of Illinois 35 Ill. Adm. Code 725, we are hereby enclosing the following:

- (1) Letter from Textron's Chief Financial Officer which demonstrates the financial test for liability coverage (sudden and non-sudden) and assurance of closure care (with Exhibit B);
- (2) Letter dated March 28, 1984 from Arthur Young and Company as to the financial information contained in the letter referenced to in paragraph (1) above;
- (3) A copy of the 1983 Annual Report of Textron Inc., containing a report by Arthur Young and Company on Textron's financial statements for the fiscal year ended December 31, 1983.

We have noted in your letter that you have requested two copies of our updated closure plan (this request pertains to our Townsend Division). We have communicated to Townsend that they are to send these copies directly to your attention.

If you require anything additional, please let me know.

g you require any many addressing presseries me most

me you have rught

James M. Barr Insurance Analyst

JMB/sc

Enclosures

cc: Susann Mark - Corporate (w/enclosures)
Paul J. Bergman - Townsend (w/enclosures)

H. A. Schult - Arthur Young & Company (w/enclosures)

John Canty - Corporate (w/out enclosures)

LETTER FROM CHIEF FINANCIAL OFFICER

(To demonstrate liability coverage and/or to demonstrate both liability coverage and assurance of closure and/or post-closure care.)

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265 and/or tests equivalent or substantially equivalent, and/or Subpart H of 35 Illinois Administrative Code Parts 724 and 725:

USEPA I.D. No. ILD042843854

Name Townsend Division of Textron Inc.

Address 6600 Oak Park Avenue, Chicago, Illinois 60638

Please attach a separate page if more space is needed for all facilities.

See Instruction (4)

Director

Illinois Environmental Protection Agency

1. This firm is the owner or operator of the following facilities for which financial assurance for closure and/or post-closure care is demonstrated through the financial test specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE FINANCIAL TEST)

USEPA I.D. No. ILD042843854	Closure Amount	Post-Closure Amount	Closure and Post-Closure Amounts
Name Townsend Division of Textron Inc.			•
Address 6600 Oak Park Avenue	\$1,050	N/A	\$1,050
City Chicago, Illinois 60638	·		
USEPA I.D. No.			
Name None			
Address			
City			•

This Agency is authorized to require this information under Illinois Revised Statutes, 1981. Chapter 111-1/2, Section 2169. Disclosure of this information is required. Failure to do so may result in a civil genalty not to exceed \$25,000 per day of violation. Falsification of this information may constitute a Class 4 felony, which also carries a fine of up to \$25,000 per day of violation for the first offense. This form has been approved by the Forms Management Center.

post-closure care of the following facilities owned or operated by sul closure care so guaranteed are shown for each facility: (LIST ALL T)		SING THE CORPORAT	IE GLARANIEE
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Please attach a separate page if more space is needed for all facilities.			
	OR FEDERAL FINANCIAL	ASSURANCE REQUIR	EMENT THAT A
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SEPA I.D. No. (5) ame See Attached Exhibit B ddress ity SEPA I.D. No. ame See Attached Exhibit B ddress ty ease attach a separate page if more space is needed for all facilities. This firm is the owner or operator of the following hazardous waste m posal facility, post-closure care, is NOT demonstrated either to IEP-assurance mechanism specified in Subpart H of 40 CFR Parts 264 and	Closure Amount (6) An USEPA or a State through 265 or equivalent or substanti	Post-Closure Amount (7) significant assurance for the financial test or a fally equivalent state me	Closure and Post-Closure Amounts '8'
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Name	None
ress	
City	
Please attach	a separate page if more space is needed for all facilities.
This owner or	operator <u>is required</u> to file a Form 10K with the Securities and Exchange Commission (SEC) for the lates
fiscal year.	
The fiscal year	r of this owner or operator ends on <u>December 31, 1983</u> . The figures for the following items marked with an asteria
are derived fro December	
	$^{ m cm}$

USEPA I.D. No

Part B. Closure or Post-Closure Care and Liability Coverage (See Instructions 14 and 15)

Alternative II

	Sum or current closure and post-closure cost estimates (total of all cost estimates listed above)	2,056,517
		<u>8.000.000</u>
2.	Amount of annual aggregate liability coverage to be demonstrated	
	Sum of lines 1 and 2	10,056,517
		A-3 Moody's
. 4.	Current bond rating of most recent issuance and name of rating service	
£.	Date of issuance of bond	June 15, 1980
	Date of maturity of bond	June 15, 2005
6.		
*7.	Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	<u>\$ 1,204,336,000</u>
•g.	Total assets in the U.S. (required only is less than 90% of assets are located in the U.S.)	\$ 1,824,000,000
		Yes No
9.	Is line 7 at least \$10 million?	<u>X</u> /
10.	Is line 7 at least 510 million? Is line 7 at least 6 times line 3? Are at least 90% of assets located in the U.S.?	
12.	If not, complete line 12. Is line 8 at least 6 times line 3?	·····/

Sgnature	Walnut Zalette
Typed name	William J. Ledbetter
Title	Executive Vice President
Dete	3129/84

	Location	EPA#	Closure Costs	Post Closure Costs
Sheaffer Eaton	301 Avenue H Ft. Madison, IA	IAD005267745	\$ 18,564	
Homelite	Little Mountain Road Gastonia, NC 28052	NCD091249417	\$ 27,300	
Bridgeport Machines	500 Lindley Street Bridgeport, CT 06601	CTD0072134927	\$ 4,571	
	Atlantic Street Bridgeport, CT 06601	CTD00841320	\$ 410	
E-Z-Go	Marvin Griffin Road Augusta, GA 30913	GAD003302064	\$ 28,283	
Spencer Kellogg	6401 Chemical Road Baltimore, MD 21226	MDD069377042	\$ 81,900	
	400 Doremus Avenue Newark, NJ 07105	NJD092217892	\$ 54,600	
Bell Helicopter	600 E. Hurst Blvd. Ft. Worth, TX 76053	TXD980626006	\$581,927	
	Plant 5 Highway 360 Avenue K Grand Prairie, TX 75050	TXD000764498	\$614,850	
	Avenue Z at 5th St. Amarillo, TX 79120	TXD043160696	\$ 71,904	*
Bell Aerospace	2221 Niagara Falls Blvd. Wheatfield, NY 52627	NYD002106276	\$188,916	
Townsend	P.O. Bos 6396 Columbia, SC 29260	SCD069326171	\$327,600	\$54,600
	6600 Oak Park Avenue Chicago, IL 60638	ILD042843854	\$ 1,092	

ARTHUR YOUNG

ARTHUR YOUNG & COMPANY 277 PARK AVENUE NEW YORK, NEW YORK 10172

March 28, 1984

The Board of Directors Textron Inc.

We have examined the consolidated financial statements of Textron Inc. for the year ended December 31, 1983 and have issued our report thereon dated February 7, 1984. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

We have read the letters dated March 28, 1984 from William J. Ledbetter, chief financial officer of Textron Inc., submitted to the Regional Administrators of the Environmental Protection Agency in support of the use of the financial test, as specified in Subpart H of 40 CFR Parts 264 and 265, to demonstrate financial assurance for closure and post-closure care of the Corporation's hazardous waste facilities at the locations listed in those letters.

In connection with Subpart H of 40 CFR Parts 264 and 265, we have compared the independently audited consolidated financial statements of Textron Inc. for the year ended December 31, 1983, the latest fiscal year, to the data in those letters indicated as being derived from such independently audited financial statements. In connection with this comparison, no matters came to our attention that caused us to believe that the specified data should be adjusted.

This report is solely to assist you in complying with the reporting requirements associated with the financial test, as specified in Subpart H of 40 CFR Parts 264 and 265, to demonstrate financial assurance for the closure and post-closure care and should not be referred to or used for any other purpose.

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STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6761

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TO BE COMPLETED BY WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706

(217) 782-6760

Authorization Number 200057

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		WASTE HAULER(S)	<u></u>		
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TO BE COMPLETED BY WASTE GENERATOR	1	Contraction of	WACTE WIATE	LIONID	
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2)(Authorized Signature)			••	DATE:	
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ENTS OR SPECIAL INSTRUCTIONS:					
	24 Unito CM	ERGENCY AND SPILL ASSI	STANCE NUMBERS		
IN ILLINOIS: 217 / 782-3637				OUTSIDE ILLINOIS: 800 / 424-8802 or 202 Generator	2 / 426-2675
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TO SE COMPLETED BY WASTE GENERATOR

SIAIE UT ILLINUIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760 SPECIAL WASTE HAULING MANIFEST

 $\underbrace{0679213}_{10}$ Authorization Number $\underbrace{922062}_{13}$

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(Facility Name) Chicasco	ZZ,	606/7 3/26 Zip 3/26	4662+2 117 ne Number	00060847[EPA Numbe:
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REV. # 4

TO BE COMPLETED BY WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

0679214

2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760 SPECIAL WASTE HAULING MANIFEST

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Authorization Number	222	062

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SHIPPING DESCRIPTION.	HAZARD CLASS:	129189	FPA HW Number
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DISTRIBUTION PART - 1 GENERATOR PART - 2 IE	PA PART - 3 SITE PART - 4 HAULER	PART - 5 IEPA PART 6 -	GENERATOR

1 532-010 LPC 62 8/81

TO BE COMPLETED BY WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760 <u>0679215</u>

Authorization Number 922062

SPECIAL WASTE HAULING MANIFEST Tr-STRUN 66-05 Oak Prak 312 735/134 03/600056/6 110042843854 Til. 66638

State Zip

WASTE HAULER(S) 5050 W. Loke St. Milking PKs W.H. Registration Number 0107037 3123457080 Phone Number S.W.H. Registration Number Haufer Address Hauler Name EPA Number Phone Number DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE 03/6008/ STONE 317446202 11700 06084 Site Number Alternate (Facility Name) EPA Number Phone Number State City TO BE COMPLETED BY WASTE PHASE: WASTE GENERATOR THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW: HAZARD CLASS UN OF NA Number

FOR HW Number a/a s OUANTITY OF WASTE DELIVERED: 0 0 3 0 0 0 2 CU. YOS. WEIGHT FOR I.E.P.A. USE MUST BE CONVERTED TO CU YDS. OR GAL. WEIGHT FOR TONS (circle one) D.O.T. USE TANK TRUCK **OPEN TRUCK** OTHER (Specify) _ METHOD OF SHIPMENT (Circle One) (DRUMS Number THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION. IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E. I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE WASTE HAULER THE DESTINATION AS IN DATE: 0 \$ 03/84 (Authorized (Authorized Signature) HAZARDOUS WASTE SUBJECT TO FEE DISPOSAL, STORAGE, OR TREATMENT FACILITY THAT THE ABOVE-DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE: (Authorized Signature) MENTS OR SPECIAL INSTRUCTIONS *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675 IN ILLINOIS: 217 / 782-3637 PART 6 - GENERATOR PART - 5 IEPA PART - 4 HAULER PART - 3 SITE DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA

TO BE COMPLETED BY WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL BROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760 0991751

Authorization Number £32063

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TO BE COMPLETED BY WASTEGENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

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24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

PART - 4 HAULER

PART - 5 IEPA

IN ILLINOIS: 217 / 782-3637

DISTRIBUTION: PART - 1 GENERATOR

PART - 2 IEPA

PART - 3 SITE

PART 6 - GENERATOR

OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

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TO BE TOMPLETED BY WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760

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TO BE COMPLETED BY WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760 SPECIAL WASTE HAULING MANIFEST

Authorization Number $\frac{9}{8}$ $\frac{22}{13}$ $\frac{062}{13}$

(Company Name)	1 6600 S; Ball Fairl 3127 Address Phot	35 1 34 0 3 1 6 0 5 5 6 6 Re Number 14 Generator Number 24
7/1/ 0 15 COY	<u> </u>	7 2 0 4 2 8 4 3 8 5 4 EPA Number
	WASTE HAULER(S)	
RONNING FEIRES	5050 W. LAKE-ST MELRI	$OSC = I/C$ S.W.H. Registration Number $\frac{O10703C}{25}$
Hauker Name	Phone Numb	7050 71097177503 er EPA Number
Hauler Name	Hauter Address	S.W.H. Registration Number 32 38
	Phone Numb	ber EPA Number
	DESTINATION — DISPOSAL STORAGE OR TREATI	
Hzus - CL MR (Facility Name)	1/800 STONLY I.	9 Srite Number 46
the case cony		26466202 5170 0 060842C
Afternate (Facility Name)	Address	39 Site Number 46
City	State Zip	Phone Number EPA Number
BE COMPLETED BY ASTE GENERATOR	Essida Waster	WASTE PHASE: 2801 2
ACCORDANCE WITH THE APPLICABLE REGULAT	WEIGHT FOR I.E.P.A. USE MUST BE CONVERTED TO CU. YDS. OR GAL. (DRUMS	A H W W W
HEREBY AGREE TO AND CERTIFY THE ABOVE W	RITTEN INFORMATION (Authorized Sign	
I HEREBY CERTIFY TO THE DESTINATION AS	HAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPS INDICATED:	PTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE
Clarence Tolkes (Authorized Signature)		DATE: Z Z Z Z S
,	·	DATE:
(Authorized Signature)		NO.
SPOSAL, STORAGE, OR TREATMENT FACILITY HEREBY CERTIFY THAT THE ABOVE-DESCRIBED (Authorized Signature)	WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SIT	HAZARDOUS WASTE SUBJECT TO FEE YES NO NO NO DATE: O TI 171 SH
TENTS OR SPECIAL INSTRUCTIONS:		
ILLINOIS: 217 / 782-3637	*24 HOUR EMERGENCY AND SPILL ASSISTANCE	OUTSIDE IELIMOIS. BOOT 424 COOL OF ECET TES EST
CTRIPUTION: PART, 1 GENERATOR PAR	RT 21EPA PART 3 SITE PART 4 HAULER PAR	IT - 5 IEPA PART 6 - GENERATOR

TO RE COMPLETED BY WASTE GENERATOR

REV. # 4

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760 <u>0679212</u>

Authorization Number $\frac{9993019}{8}$

	SPECIAL WA	STE HAULING MANI	FEST	g
WAS IND TOUTED	6600 Se. Oak Fr	ark 3/27	2 3 1 1 3 4 .	C 3 / 6 C C 6 5 6 / 6 Generator Number 24
(Company Name)	Address T1. 60 State Z			12042843854 EPA Number
City	State Z	the second state of the second	angagatika meneranan angan inima karasangan palakikan menggapantan angangan ka	ELY MILLOS:
		WASTE HAULER(S)		
VORTH BRANCH P.C	Bay 1660 Haule: Address		SWH	Registration Number $\frac{O}{25}$ $\frac{2}{2}$ $\frac{O400}{400}$
Hauler Name	Maple: Add 855	31248 Phone Numb	<u>1818</u>	112093161495 EPA Number
			\$ ₩ H	Registration Number 32 38
Haule: Name	Hauler Address			
		Phone Num	and the second s	EPA Number
	DESTINATION - DI	SPOSAL STORAGE OR TREAT	MENT SITE	0 3 1 3 0 - 0 0
FINERY TRODS.	4256 W/51	E-/		39 Site Number 46
STINTEL PRODS. Facility Name: SOHILLER PARK City	IL.	6017631	12678826	2 /1D000665786
City	State	Zip	Phone Number	ETA Hallot
Atternate (Facility Name)	Address			39 Site Number 46
	State	Zip	Phone Number	EPA Number
City TO BE COMPLETED BY				10,0
WASTE GENERATOR	EGREASER -	57,12 MAS	WASTE PHASE: _	Liquid. Gaseous. Solid)
THE SPECIAL WASTE BEING TRANSPORTED UNDER THE SHIPPING DESCRIPTION: HAZARDOUS WASTE. WEIGHT FOR LBS	HAZARD CLASS: ORM-E WEIGHT FOR LE P.A. USE MI	UST BE QUALITY OF MAS	182 IA Number STE DELIVERED: 00	EPA HW Number GALLONS (CHOICE One) 2 CU VOS
D.O.T. USETONS (circle on	CONVERTED TO CU. YDS. OR	DAL.	OTHER (Specify)	53
HILTHOUGH SIM WEST (SAME MASSES WASTE WAST	Number PROPERLY CLASSIFIED DESC	RIBED PACKAGED MARKED	, and labeled and is in P P.A.	ROPER CONDITION FOR TRANSPORTATION.
IN ACCORDANCE WITH THE APPLICABLE REGULATION	IS OF THE ICEMOIS BE ATTIMENT OF	Den	e e	DATE: 1-6-84
I HEREBY AGREE TO AND CERTIFY THE ABOVE WRIT	EN INFORMATION	(Aythorized Sig	nature)	and the second s
WASTE HAULER I HEREBY CERTIFY THAT THE DESTINATION AS IN	THE ABOVE-DESCRIBED WASTE AND	QUANTITY HAS BEEN ACCE	PTED IN PROPER CONDITION	FOR TRANSPORT AND I ACKNOWLEDGE
THE DESTINATION AS IN	1115	JAN 13 198	J4	DATE: 1 6 8 4
(1) (Authorized Signature)		7VM 12		1 1
(2)				DATE:
(Authorized Signature)			HAZADDONO WILL	TE SUBJECT TO FEE YESNO
DISPOSAL, STORAGE, OR TREATMENT FACILITY"	A	DEEM APPENTED AT THE CI		\sim
Com W Tax	ST AND INDICATED QUANTITY HAS	S BEEN AUGERTED AT THE ST	TE STEUTILE ADOVE.	DATE: 65
(Authorized Signature) AMENTS OR SPECIAL INSTRUCTIONS				-
	24 HOUR EMER(GENCY AND SPILL ASSISTAN	CE NUMBERS	OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-267
IN ILLINOIS: 217 / 782-3637 DISTRIBUTION: PART - 1 GENERATOR PART -			RT-51EPA PART6.	GENERATOR

TO BE COMPLETED BY WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760 $\underline{067921}\underline{6}$

Authorization Number 2 40/5/

	SPECIAL	WASTE HAULING	MANIFEST	
2/	6/		20121	031600050 0360005 14 Generator Number
MASIN DIE TRUI	Address	ONRE 31	Phone Number	14 Generato: Number
Mess e- o City	Til l	6.638	_7	120428438
City	State	Zip		EPA Number
**************************************		WASTE HAULER(S)		-
Manuel .	9-29 ////	and Mari	Rese PV	2297/1
Hauler Name	Haufer Address /	yare 1-12 -	SWH .	Registration Number 25747779
		<u>بی ن / دی</u>	153806 ine Number	110042438
		Pho		Esa Maunes.
Hauler Name	Hauler Address		SWH	Registration Number 32
			one Number	EPA Number
01/		DISPOSAL STORAGE OF	R TREATMENT SITE	0311860
TREY OHIMICUSC (Facility Name)	Address	DYNE		03/Site Number
Interest Ex	Tec.	60160	1312218380	61100744249_ EPA Number
City	State	Zip	Phone Number	EPA Number
Alternate (Facility Name)	Address	3		39 Site Number
City	State	Zrp	Phone Number	EPA Number
BE COMPLETED BY	Old to			
STE GENERATOR	cHlonersH	LUNG	WASTE PHASE:	(Liguid, Gaseous, Solid)
SPECIAL WASTE BEING TRANSPORTED UNDER THE	S MANIFEST IS OF THE DOT HAZ	ZARD CLASSIFICATION I	-	(Liquid, Gaseous, Solid)
SHIPPING DESCRIPTION:	HAZARD CLASS:		1710	
		No U	N1847	EPA HW Number
TRICHL ORCH THYLONI-	ORM-A	70	UN or NA Number	
			DF WASTE DELIVERED. 000	O = 1 GALLONS (Circle
GHT FOR T. USE SOO TONS (circle one)	CONVERTED TO CU. YDS. (OR GAL.	47	52
METHOD OF SHIPMENT (Circle One) (DRI	UMS) TANK 1	TRUCK OPEN TRU	ICK OTHER (Specify)	
			AND AND AND IS NOT BE	OPEN CONDITION FOR TRANSPORTATION
S IS TO CERTIFY THAT THE ABOVE NAMED WASTE ACCORDANCE WITH (ABOUTHOLE REGULATIONS	ARE PROPERLY CLASSIFIED, DES OF THE ILLINOIS DEPARTMENT	SCRIBED, PACKAGED, M OF IBANSPORTATION A	ND I.E.P.A	OPER CONDITION FOR THANSPORTATION.
EREBY AGREE TO AND CERTIFY THE ABOVE WRITTE		Farmon	A Dunh	DATE: 4/2/84
REBY AGREE TO AND CERTIFY THE ABOVE WHITE		(Authori	zed Signature)	
STE HAULER LIEDERY CERTIES THAT T	THE AROVE-DESCRIBED WASTE A	IND QUANTITY HAS BEE	N ACCEPTED IN PROPER CONDITION	FOR TRANSPORT AND I ACKNOWLEDGE
THE DESTINATION AS INDI				
0117 +				DATE: 24/10/8
(Authorized Signature)	:			DATE: 54
Videosia and Video				DATE:/
(Authorized Signature)				
POSAL, STORAGE, OR TREATMENT FACILITY"		an a sandan an an an a sanda sanda sanda an an an an an an an an an an an an an	HAZARDOUS WAST	SUBJECT TO FEE YES NO
EREBY CERTIFY THAT THE ABOVE-DESCRIBED WAS	TE AND INDICATED QUANTITY H	AS BEEN ACCEPTED AT		,
LINEOT DENTILL THAT THE ROOTE DESCRIBE	0/11			DATE POLICIE
(Authorized Signature)	-purpose			
			100000000000000000000000000000000000000	
ENTS OR SPECIAL INSTRUCTIONS:				
	*24 HOUR EME	RGENCY AND SPILL ASS	SISTANCE NUMBERS"	OUTSIDE LLINOIS: 800 / 424-8802 or 202 / 42
ILLINOIS: 217 / 782-3637			PART - 5 IEPA PART 6 - G	

IL 532-610 LPC 62 B/B1

TO BE COMPLETED BY WASTE GENERATOR

DISTRIBUTION: PART - 1 GENERATOR

REV. # 4

PART - 2 IEPA

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6760 <u>0679217</u>

Authorization Number 940/5/

SPECIAL WASTE HAULING MANIFEST Address 3/2735/134 Phone Number 11 Do 4284385 ASSTLEMO WE MILROSE PARK

Hauler Address

J123453806 S.W.H. Registration Number 029700[11207442493 EPA humber S.W.H. Registration Number _______ Hauler Address Mauder Name Phone Number EPA Number DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE 2537 LEMOYNI-60160 31234538061 Alternate (Facility Name) Address Site Number State Phone Number City EPA Number TO BE COMPLETED BY WASTE GENERATOR WASTE NAME TRICHLOROFTHYLING WASTE PHASE: _ THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW. HAZARD CLASS SHIPPING DESCRIPTION WEIGHT FOR LE.P.A. USE MUST BE QUANTITY OF WASTE DELIVERED: WEIGHT FOR CONVERTED TO CU YDS. OR GAL. METHOD OF SHIPMENT (Circle One) TANK TRUCK OPEN TRUCK OTHER (Specify) THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P.A. I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION (Authorized Signature) **WASTE HAULER** I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE DATE: 05/07/ 84 (Authorized Signature) DISPOSAL, STORAGE, OR TREATMENT FACILITY" HAZARDOUS WASTE SUBJECT TO FEE I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND INDICATED D QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE: DATE 05707/8 ized Signature) NTS OR SPECIAL INSTRUCTIONS *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675 IN ILLINOIS: 217 / 782-3637

PART - 4 HAULER

PART - 5 IEPA

PART 6 - GENERATOR

PART - 3 SITE

E 532-610 LPC 62 8/81

TO BE COMPLETED BY WASTE GENERATOR

DISTRIBUTION: PART - 1 GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706

(217) 782-6760

0991752

Authorization	Number	9	40	2_	<u>_</u> _S	
	_	8				13

	SPECIA	AL WASTE HAULING	MANIFEST	03160005	6/ 13
(Company Name) (HIC AS C- B) CRY	6600 S. O.	k Frek 11	27351134	11004284	<u></u>
(Company Name)	Address		Phone Number	t4 Generator Number	24
CHICAGE	<u></u>	60638	-	11 D 0 42843 EPA Number	<u> </u>
Cay	Sax	waste hauler(s)			
Hauter Name 253	Hauter Address	XN2-		H. Registration Number $\frac{\omega}{25}$	
Flaguette Pearling		<u> </u>	453806	11 DO7 442	47938
		Pho	, C (10)		
Hauter Name	Hauler Address		S.W.	H. Registration Number	38
1200				EPA Number	
	The state of the s	Ph N — Disposal Storage o	one Number D TREATMENT SITE	EFA RUITOS	<u> </u>
Droper Phine.	25-37 LH	Alonno	THERTMEN STILL	<u> </u>	603
Facility Name)	Adx	ress		39 Site Number	er 46
(Facility Name) LIFLEO X- PARK City	16	60160	212245380	6 110 67442 FPA Number	4932
Сиу	State	Z∎p	Phone Number	El A Homool	
Alternate (Facility Name)	Ack	kess	-	39 Site Numb	per 46
	State	Zip	Phone Number	EPA Number	
City FD BE COMPLETED BY	3610				
WASTE GENERATOR WASTE NAME OF COLOR	HOROET	HILENE	_ Waste Phase	(Eiquid, Gaseous, Solid))
THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS	MANIFEST IS OF THE DOT	HAZARD CLASSIFICATION	NDICATED IMMEDIATELY BELOW	(Exquire, Gaseous, Solid)	
Shift into besome them:	HAZARD CLASS:	.,	N1710	FPA HW Number	
RICHLOROFTHYLUNG	ORM-	1 RG -	UN or WATNAMber	EPA HW Number	
		LISE MUST RE		0 3 7 5 TEALLON	S (Circle One)
WEIGHT FOR LBS D.O.T. USE TONS (circle one)	CONVERTED TO CU. Y	DS. OR GAL.	OF WASTE DELIVERED: 47	52 2 00. 103	53
METHOD OF SHIPMENT (Circle One) (DRUI	MS) TA	ANK TRUCK OPEN TR	OTHER (Specify)		
THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE A	Number IDE DOODERIY (NASSIFIE)	DESCRIBED, PACKAGED, N	Marked, and labeled and is if	PROPER CONDITION FOR TRANSPORTATION	ON,
IN ACCORDANCE WITH THE APPLICABLE REGULATIONS I	OF THE ILLINOIS DEPARTM	ENT OF TRANSPORTATION	AND I.E.P.A.	DATE: 6-4	84
I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN	INFORMATION	(Author	ized Signature)	DATE:	
				ON FOR TRANSPORT AND LACKNOW! EDGS	
WASTE HAULER I HEREBY CERTIFY THAT THE DESTINATION AS INDICE		STE AND QUANTITY HAS BEE	N ACCEPTED IN PROPER CONDITI	ON FOR TRANSPORT AND I ACKNOWLEDGE	-
10-1 n-1	<u> </u>		•	DATE: 26/04	1184
(1) Reshort Tues (Authorized Signature)	15-/_			DATE:	<u> </u>
(Authorized digitality)				DATE:	/
(Authorized Signature)					
DISPOSAL, STORAGE, OR TREATMENT FACILITY*				ASTE SUBJECT TO FEE YES	ــــــــــــــــــــــــــــــــــــــ
I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WAST	TE AND INDIDATED QUANTI	TY HAS BEEN ACCEPTED AT	THE SITE SPECIFIED ABOVE:	ALIA	1/18/1
Many	thelips			DATE: 20109	<u>"</u> رت"
(Kutforized Signature)				Þ	
1ENTS OR SPECIAL INSTRUCTIONS:					
IN ILLINOIS: 217 / 782-3637	*24 HOUR	EMERGENCY AND SPILL AS		OUTSIDE ILLINDIS: 800 / 424-8802 or	r 202 / 426-267
IN ILLINUIS: 217 / 1821-3037			DADY FIEDA DADY	CENCOATOR	

PART - 4 HAULER

PART - 3 SITE

PART - 2 IEPA

PART - 5 IEPA

PART 6 - GENERATOR

TO BE CONTINUED BY

WASTE GENERATOR

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF LAND POLLUTION CONTROL 2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706

(217) 782-6760 SPECIAL WASTE HAULING MANIFEST

	SPECIAL	*	W 411 60 /	-		
WASIND / TONTAN	6600 S. On,	KARK312				
(Company Alame)		0 (3 8 - Zip		1000	428438. EPA Number	<u>5~ K</u>
VI)		WASTE HAULER(S)		_	-	
TREX CHM. 2	137 Li-140 Hauler Address	Jarci -		S.W.H. Registration Numb	n <u>02976</u>	> 0 / 31
Hauler Name	Hauler Address	3/2/4 Phone h	5386 C		O J Y Y 2 Y 3 EPA Number	
Hauler Name	Hauler Address		:	S.W.H. Registration Numb	er	38
ERROLL ISSUE		Phone	Number — —		EPA Number	
	DESTINATION -	– DISPOSAL STORAGE OR TR	REATMENT SITE			
Gracy Ollen.		SHOYNE		<u>C</u>	Site Number	<u>03</u>
HUROSCY PIK	State	6.6160 -	3/23/53 Phone Number	80626	PA Number	7528
Alternate (Facility Name)	Addres	SS .		3	Site Number	46
	State	Zip -	Phone Number		EPA Number	
City BE COMPLETED BY	and the second s			1.	- ()	
STE GENERATOR WASTE NAME: E SPECIAL WASTE BEING TRANSPORTED UNDER TO	CHLOROK	AZARO CLASSIFICATION INDI	Waste Pi Cated Immediately Be		quid, Gaseous, Solid)	
SHIPPING DESCRIPTION.	HAZARD CLASS:	1/2	or NA Number		Number .	-
IGHT FOR LBS 10.1. USE 10NS (circle on	WEIGHT FOR I.E.P.A. US	E MUST BE	waste delivered: 47	00033	2 CU. YDS.	cle One)
WEITION OF SAME MICHAEL (Second Same)	Number	K TRUCK OPEN TRUCK				
IS IS TO CERTIFY THAT THE ABOVE-NAMED WAST ACCORDANCE WITH THE APPLICABLE REGULATION	E ARE PROPERLY CLASSIFIED, D NS OF THE ILLINOIS DEPARTMEN	DESCRIBED, PACKAGED, MAR IT OF TRANSPORTATION AND	KED, AND LABELED AND			
IEREBY AGREE TO AND CERTIFY THE ABOVE WRIT		I a simulation	d Signature)	DAT	7-2-87	
ASTE HAULER I HEREBY CERTIFY THAT THE DESTINATION AS IN	THE ABOVE DESCRIBED WASTE	AND QUANTITY HAS BEEN A	ACCEPTED IN PROPER CO	NDITION FOR TRANSPORT	AND I ACKNOWLEDGE	
() RBU	The			Di	ATE: Q 2/02/	24
(Authorized Signature)					ATE:	
(Authorized Signature)						
ISPOSAL, STORAGE, OR TREATMENT FACILITY®	,	:		ys waste subject to i	EE YES	40
BEREBY CERTIFY THAT THE ABOVE DESCRIBED W	ASTE AND INDICATED DUANTITY	MAS BEEN ACCEPTED AT TH	HE SITE SPECIFIED ABOVE	E: • • • • • • • • • • • • • • • • • • •	ate & ZIC216	<u>84</u>
NTS OR SPECIAL INSTRUCTIONS:						
	24 HOUR E	MERGENCY AND SPILL ASSIS	TANCE NUMBERS	OUTSIDE ILL IN	DIS: 800 / 424-8802 or 202	/ 426-26
N ILLINOIS: 217 / 782-3637	2 IFPA PART - 3 SITE	PART - 4 HAULER		PART 6 - GENERATOR		

PART - 2 IEPA

L532-0610

LPC 62 8/81

		ит 8700-22 (3-84)	The second secon		0-0404 Expres 7-31-5
UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No.	Manifest Document No.	of I	required by Fede by Illinois law	e shaded areas is not rallaw, but is required
3. Generator's Name and Mailing Address TOWNSEND DIS OF	- CYTEAN		A.Illinois Ma	nifest Document	Number
TOWNSEND DY OF	TEXTOGO II	_ 60638		120130	
6600 S. OAK TR. A	IVE CALLO IS		B.Illinois Generator	S-71/	40010
4. Generator's Phone (3 2) 735	5-1134	A ID Number	C.Einois Tra		200101101
5. Transporter 1 Company Name	Ψ. <u> </u>	4424938			ensporter's Phone
DETREX		PA ID Number		nsporter's ID	111
7. Transporter 2 Company Name			F.()	Tra	ensporter's Phone
9. Designated Facility Name and Site Addres	s 10. USEF	PA ID Number	G.Minois	کالا <u>ن</u>	7603
DETREY CHEMICAL		•	Facility's		40.010
		111-110-25	HLFacility's	Phone 34 <i>5-</i> ■3	866 _
I MEL ROSE YK. IL	60160 11-1001	4424938	2 (32) 2	13. 14.	
11. US DOT Description (Including Proper S	Shipping Name, Hazard Class, and	ID Number) 12.00	ilaneis	Total Unit	L Waste No.
HM LOCATION	DV 5 VE	No.	DMS	Quantity Wt/Vo	EPA HW NUTTION
a TRICHLORETA	4 YLENE		W'V		Authorization Number
ORM-ARQ	UN 1710	1.12		100 GAL	94015
6000					EPA HW Number
O. GROSS WT. C	2,000 IB3				Authorization Number
					EPA HW Number
c.		[1 1 1
				ļ	Authorization Number
					EPA HW Number
d					
					Authorization Number
J. Additional Descriptions for Materials Lister	d Above		K. Handling	Codes for Wast	es Listed Above
Additional Descriptions for materiess assets	3,2015				
		Lister All			
		t Pitaloga			
15. Special Handling Instructions and Addition	onal Information			<i>165</i>	
			,		
16. GENERATOR'S CERTIFICATION: I he	reby declare that the contents of t	nis consignment are fi	ully and accura	tely described	
above by proper shipping name and are for transport by highway according to a	applicable international and national	i governmental regula			Date
	O:ti.				
Printed/Typed Name	Signatu	re:	$\sqrt{2}$		
Printed/Typed Name MICHAEL BEA	- I - \ \	e Lel	By	7	1/0058
MICHAEL BEA	eceipt of Materials	reliel	B		/ 00 5 8 Date
17. Transporter 1 Acknowledgement of Re	26 N	reliel	Bu		Date Month Day Ye
17. Transporter 1 Acknowledgement of Re Printed/Typed Name P(C.h. R.C.) FUENTES	eceipt of Materials Signatu	reliel	Bu	Total States	/ O 5 8 Date Month Day Yo 0 0 5 8
17. Transporter 1 Acknowledgement of Re Printed/Typed Name Richard Fuents 18. Transporter 2 Acknowledgement or Re	eceipt of Materials Signature	short Fr	Bu wate	VEN.	
17. Transporter 1 Acknowledgement of Re Printed/Typed Name Printed/Typed Name 18. Transporter 2 Acknowledgement or Re Printed/Typed Name	eceipt of Materials Signatu	short Fr	Bunto GEL		
17. Transporter 1 Acknowledgement of Reprinted/Typed Name 18. Transporter 2 Acknowledgement or Reprinted/Typed Name	eceipt of Materials Signature	short Fr	Bunto	VEN IORA	/ O
17. Transporter 1 Acknowledgement of Response Printed/Typed Name 18. Transporter 2 Acknowledgement or Response Printed/Typed Name 19. Discrepancy Indication Space	eceipt of Materials Signature	short Fr	UCI 12	下 1984	
17. Transporter 1 Acknowledgement of Re Printed/Typed Name 18. Transporter 2 Acknowledgement or Re Printed/Typed Name 19. Discrepancy Indication Space	eceipt of Materials Signature	short Fr	JS. John To	1984	
17. Transporter 1 Acknowledgement of Research Printed/Typed Name 18. Transporter 2 Acknowledgement or Research Printed/Typed Name 19. Discrepancy Indication Space	eceipt of Materials Signatu ceipt of Materials Signatu	re De			
17. Transporter 1 Acknowledgement of Re Printed/Typed Name 18. Transporter 2 Acknowledgement or Re Printed/Typed Name 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certificati	eceipt of Materials Signatu ceipt of Materials Signatu	re De			Date Month Day You Date Month Day You Date Month Day You
17. Transporter 1 Acknowledgement of Research Printed/Typed Name 18. Transporter 2 Acknowledgement or Research Printed/Typed Name 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification term 19.	ceipt of Materials Signatu Signatu Signatu on of receipt of hazardous mater	re to this			Date Month Day Ye Date Month Day Ye Date
17. Transporter 1 Acknowledgement of Reprinted/Typed Name 18. Transporter 2 Acknowledgement or Reprinted/Typed Name 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification Item 19.	eceipt of Materials Signatu ceipt of Materials Signatu	re to this			Month Day Ye
17. Transporter 1 Acknowledgement of Responder Printed/Typed Name 18. Transporter 2 Acknowledgement or Responder Printed/Typed Name 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification Item 19.	ceipt of Materials Signature Ceipt of Materials Signature Signature Signature Signature Signature Signature	re hold for this ire	manifest exce	pt.as noted in	Date Month Day Ye Date Month Day Ye Date Month Day Ye Month Day Ye Date Month Day Ye Month Day Ye
17. Transporter 1 Acknowledgement of Reprinted/Typed Name 18. Transporter 2 Acknowledgement or Reprinted/Typed Name 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification Inc.	ceipt of Materials Signatu Signatu Signatu on of receipt of hazardous mater	re face of this are makes a stance of the st	manifest exce	pt.as noted in	Date Month Day Ye Date Month Day Ye Date Month Day Ye Month Day Ye Date Month Day Ye A Date Month Day Ye A Date Month Day Ye Date Month Day Ye A Date Month Day Ye A Date Month Day Ye Date Month Day Ye A Date Month Day Ye Date

NONHAZARDOUS CERTIFICATION

This i	s to certify that _	Cyanide Solution	waste received	10/3/84
from _		end Division of Textror		on manifest
, #		has been rendered no		r EPA definitions by
Enviri	ite Corporation,	in full compliance with	h the terms of E	nvirite Corporation's
delistir	ng petition grant	ed by the U.S. EPA D	ecember 16, 1981	1.
Corpo waste	ration has elim	hazardous waste into inated all <u>Townsend Div</u> material under RCRA	vision of Textro	<u>n </u>
(Geoffrey Stengel,	Jr.	Ope	erations Manager
	President			

ENVIRITE

Corporate Headquarters Blue Bell, Pennsylvania 19422

NONHAZARDOUS CERTIFICATION

This is to certify that?	Alkaline w/Cyanide nd Division of Textron	vaste received	9/14/84
from			EDA definitions by
Envirite Corporation,	has been rendered non , in full compliance with ted by the U.S. EPA Dec	the terms of En	virite Corporation's
Corporation has elim	s hazardous waste into inated all <u>Townsend D</u> s material under RCRA (2	iv. of Textron	future hazardous
Act of 1976).	nh.	1,00	Ir! Dyklon
Geoffre) Stengel, President	Jr.	Орег	rations Manager

ENVIRITE

Corporate Headquarters Blue Bell, Pennsylvania 19422

OPERATING RECORD OF WASTE DISPOSAL AND TREATMENT

	TAN	K	TREATMENT	DISPO	SAL
DATE	LOCATION	QUANTITY	DATE	QUANTITY	DATE
. /					CONTRACTOR OF THE PROPERTY OF
17-1-83	VADETE (PROM)	320 gal.		Burgal.	11-2-83
1.76.5	- //	You gal.	11-5-83		
11-5-83	' //	160 get	11-7-83	<u> </u>	
11.7-83	//	, , , , , , , , , , , , , , , , , , , ,	11-12-83	<u> </u>	
1/-12-83	4	160 gel	11-14-83		
11-14-83		160 gal.	11-19-83	and the second s	-
1-19-83			11-21-83	and the same of th	
11-21-83	7	160 gal.	11-28-83	A STATE OF THE STA	3000
1-29-85	<u>'</u>	160 gal.	12-2-83		
2-2-8-3		160gal.	12-7-83		
2-7-83		160 gal.	12-8-83		
12-8-83	l .	77	12-12-83		
12-12-83	1		12-16-83		
2-16-83	<i>V</i>	Joo gel	12-23-83		
	1		1-10-84		
10-8\$	4	160 gel.		3000 jel.	1-11-84
1-4-84		320 gel.	1-12-84		
11961	-	600 gel	1-19-84		
1-11-17		. 0 .	1-24-84	77.2	
1-24-09	4	16000	1-28-84		
1-28.8	1	160 gel.	1-28-84		
1-30-84	1/	160 gel.	1-31-84		
24-84	1/	350 cal	2-4-84	2000	
	1	0 0	2-15-64		
2-15-18-1		you gal	2-20-54		
2-24-84		170 gul	2-24-84		
		5 10 sal		3 cmogal,	2-24-84
27-57		510 gal	2-27-84		
3-27-84		160 gap.	3-8-801		1444 A
8/13-8-1	'/	170. g/s. G.	3-13-8Y		
3-14-84	4	170 gal,	3-14-84		
5-15-14		160 gel	3-15-8-1		
	4	200 gril	3-19-84		
5-22-84		160 gal	3-22-84		
P-22-07	"	1/			Annual An



METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGO 100 EAST ERIE STREET . CHICAGO, IL 60611

INDUSTRIAL WASTE DIVISION (312) 751-5697

NO. 078444

INDUSTRIAL WASTE/SLUDGE GENERATION, SHIPMENT AND DISPOSAL RECORD

			1
G		AVK \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	(SPECIFY) VOLUME
E	7.31	rucx) DRUMS	GALS CU
F	WASTE CONTÂINS:		YDS.
R		[]	LBS.
A	FATS, OILS OR GREASE X CYANIDE X COPPER X NICKEL	MERCURY	-
6	ACID & ZINC & CHROME LEAD	OTHER	
Ř	ALKALI CADMIUM KRON SELENG	JAA (SPECIFY)	
	Z ALAXO		
	DISPOSAL DESTRUCTION	2 _ OTHER	
٥ا	METHOD & LANDFILL DESTRUCTION CANALITY CO	SPECIF	
F	NAME OF	FEDERA	HER 11 DO 42843854
	COMPANY TOWNSFURD TOYTRUE	1.0.00	222078673631
ŀ	LOCATION		IL. 60634
w	6600 So. Oak Park AVE	- CHIOREN	
A	TYPE OF	DATE RE	MOVED TIME REMOVED
۱ ۲	NOUSTRY (DE) HENDING) -	24-81 1243 /-
E	I certify that the described waste, in the designated volume, was remo	oved from this location by th	e contractor nameā below for legal
1	disposal.	•	
	SIGNATURE OF		PHONE
	AUTHORIZED AGENT	e Supui	735-N34
	AND TITLE		/
		FEDER	11 717
	NAME	I. D. NU	MBER
	BROHNING-FERRIS IND.		2009/17/505
	ADDRESS		ECEIVED TIME RECEIVED
	5050 W LIKE ST. MELROSE PAR	1 2-	29-89 39570
	WASTE HAULER'S STATE	TRUCK	
	REGISTRATION NO. 0107039	UCENSE NO.	(2XX40
	I certify that the described waste, in the designated volume, was remo	oved from the above location	n and delivered to the disposal site
		The design locally	· · · · · · · · · · · · · · · · · · ·
	designated below.		PHONE
	SIGNATURE OF CONTRACTOR'S	K.F	3123451050
	AGENT AND TITLE	up	3723457080
			gr
Г	NAMED .	<i>#</i> ,	ERAL TAX NUMBER
ł	affen- Clina	i	22100060711
]	ADDRESS 011	ا ه	ECEIVED TIME RECEIVED
1	11800 STONEY IS. CHICAL	e, ILL	
l	I certify that the above named contractor delivered the described wa	Me, in the designated volum	e to this facility and same was received
ĺ		ere, me erenenenen reren	<i>'</i>
ŀ	for lawful disposition as designated.	PERMIT NO.	PHONE
ŀ	SIGNATURE OF OPERATOR	PEROTAL INC.	PHONE
1	AND TITLE	1 -	.



METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGO 100 EAST ERIE STREET . CHICAGO, IL 60611

NO. 078445

INDUSTRIAL WASTE DIVISION (312) 751-5697

INDUSTRIAL WASTE/SLUDGE GENERATION, SHIPMENT AND DISPOSAL RECORD

			•
•	TYPE OF	BULK OI	HER (SPECIFY) YOLUME
١.	WASTE DUQUED SLUDGE SOLID CONTAINER	TRUCK DRUMS	GAL
l'è	WASTE CONTAINS:		CL
Ī		r	LB
1 4	FATS, OILS OR GREASE CYANIDE COPPER NIC	KEL MERCURY	**************************************
d	ACID ZENC CHROME LE	AD OTHER	
F	ALKAU CADMIUM TRON SEI	ENIUM (SPECIFY)	•
	DISPOSAL	/ /	
0	METHOD & LANDFILL DESTRUCTION CO. D. FIUS		am Arrae Pareipirorios
	COMPANY TOWN SAND TOWNERUW	FEDE I. D. N	RAL TAX IUMBER 21204/284/3854
	LOCATION	1	
W	6600 S. Oak Pank Ave CA	ficaco, ALL	60638
\$	INDUSTRY PRODUCTION AND AND AND AND AND AND AND AND AND AN	DATE	REMOVED TIME REMOVED
É	I certify that the described waste, in the designated volume, was re	moved from this location by	the contractor named below for legal
	disposal.	smoved from this location by	the contactor numer below to legal
l	SIGNATURE OF		PHONE
	AUTHORIZED AGENT AND TITLE	GriNG SUPY	312735-1134
Г	NAME		RAL TAX
1	BRUNNING-FORRIS	I. D. (NUMBER 312091177508
1	ADDRESS		RECEIVED TIME RECEIVED
	5050 W. LAKE ST. HELROSOF	R ICC. Y	-3-84 800 Am
1	WASTE HAULER'S	TRUCK	150011
	REGISTRATION NO. (1) (0) 7037	LICENSE NO.	128890
	I certify that the described waste in the designated volume, was re	moved from the above locat	tion and delivered to the disposal site
İ	designated below.		
1	SIGNATURE OF CONTRACTOR'S	• "	PHONE
	AGENT AND TITLE		31-341-7010
İ	NAME		DERAL TAX
1	Often-cline		724
l	ADDRESS	_ [=::=	RECEIVED
١,	1800 STONEY IS CHICAGO, IL		
	I certify that the above named contractor delivered the described v	vaste, in the designated volu	me to this t
	for lawful disposition as designated.		Table 1
	SIGNATURE OF OPERATOR	PERMIT NO.	PHONE



METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGO 100 EAST ERIE STREET * CHICAGO, IL 60611

NO. 078446

PHONE

INDUSTRIAL WASTE DIVISION (312) 751-5697

INDUSTRIAL WASTE/SLUDGE GENERATION, SHIPMENT AND DISPOSAL RECORD VOLUME OTHER (SPECIFY) TYPE OF BULK TYPE OF CONTAINER 0 حوجي TANK) GALS SOUD SWOGE ζŲ. YDS ▶ WASTE CONTAINS: LBS MERCURY NECKEL COPPER CYANEDE FATS, OILS OR GREASE OTHER LEAD CHROME ACID 22HC 0 (SPECIFY) TEICHLOROFTIE SELENIUM CADMIUM #ON ALKAU DISPOSAL DESTRUCTION LANDFILL METHOD EDERAL TAX I. D. NUMBER -NAME OF COMPANY LOCATION PART AVE I certify that the described waste, in the designated volume, was removed from this location by the contractor named below for legal disposal. SIGNATURE OF AUTHORIZED AGENT AND TITLE FEDERAL TAX I. D. NUMBER WASTE HAULER'S LICENSE NO. t certify that the described waste, in the designated volume, was removed from the above location and delivered to the disposal site designated below. 345-3806 SIGNATURE OF CONTRACTOR'S AGENT AND TITLE FEDERAL TAX I. D. NUMBER TIME RECEIVED DATE RECEIVED 60/60 I certify that the above named contractor delivered the described waste, in the designated volume to this facility and same was received

PERMIT NO.

GENERATOR'S COPY

for lawful disposition as designated.

SIGNATURE OF OPERATOR

AND TITLE



METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGO 100 EAST ERIE STREET . CHICAGO, IL 60611

INDUSTRIAL WASTE DIVISION (312) 751-5697

NO. 078447

INDUSTRIAL WASTE/SLUDGE GENERATION, SHIPMENT AND DISPOSAL RECORD

	TYPE OF	BULKOTHER (SPECIFY)	VOLUME
Ė	WASTE D LIQUID SLUDGE SOUD CONTAINER (TRUCK) DRUMS	GALS
N	WASTE CONTAINS:	/1 /	CU
E	WASIE CORTAINS.		YDS.
R		 1	LBS.
A	FATS, OILS OR GREASE CYANIDE COPPER NICKEL	MERCURY	l
0	ACID ZINC CHROME LEAD	OTHER	-
8			
	ALKALI CADMIUM RON SELEN	UM SPECIFICATE OF	POETHILENG
	DISPOSAL		, ,
	T DESTRUCTION	OTHER (SPECIFY)	
0			*/V
F	NAME OF	FEDERAL TAX	
	COMPANY TOWN SEND / TEXTRON	7. D. NOWIBER 7/23	042843884
ı	LOCATION	7. /	
w	6600 So. Oak Bank AVI- CA	france, ILL. 600	628
A		DATE REMOVED	TIME REMOVED
S	TYPE OF	511	1-0-
T	INDUSTRY COSP HINDING	5-7-84	
E	I certify that the described waste, in the designated volume, was rem	oved from this location by the contractor	named below for legal
	disposal.	·	
	SIGNATURE OF	PHONE	
	AUTHORIZED AGENT		
	AND TITLE	372-	735-1194
	10		
	NAME	FEDERAL TAX	20-421-24A
i	1 / N # //	I. D. NUMBER	22 10 30
	DETREY CHENICAL		
	ADDRESS	DATE RECEIVED	TIME SECEIVED
-	2-27 LI-MOWE WHALE Ph	76.66160 5-7-X4	الاستختار
	7577 LI-MOYNU MILASSE PK	TRUCK	
		UCENSE NO 4	
	REGISTRATION NO. 0297/00 10		7
	I certify that the described waste, in the designated volume, was rem	oved from the above location and delive	red to the disposal site
	designated below.		
		PHONE	
	AGENT AND TITLE RUNAU FLUENTES		200/
	AGENT AND TITLE	373	3806
	NAME-	FEDERAL TAX	
	Duran Chumiant	I. D. NUMBER	074424938
		DATE RECEIVED	I TIMÉ RECEIVED
	ADDRESS	- a	110001700
	2537 LEMONIE MALROSE OV 3	ZL.60160	
-	I certify that the above named contractor delivered the described wa	ste, in the designated volume to this faci	ity and same was received
	· · · · · · · · · · · · · · · · · · ·	sia, in the designated telefite to the two	,
	for lawful disposition as designated.		
	SIGNATURE OF OPERATOR	PERMIT NO. PHONE	



METROPÓLITAN SANITARY DISTRICT OF GREATER CHICAGO 100 EAST ERIE STREET . CHICAGO, IL 60611

NO. 078448

INDUSTRIAL WASTE DIVISION (312) 751-5697

	INDUSTRIAL WASTE/SLUDGE GENERATION, SHIPMENT AND DISPOSAL RECO	ORD
, <u> </u>	TYPE OF BULK	OTHER (SPECIFY) VOLUME
	WASTE DUDO SLUDGE SOUD CONTAINER (TANK) DRUMS	GALS CI
É	WASTE CONTAINS:	CU YOS.
R	FATS, OILS OR GREASE CYANIDE COPPER MICKEL MERCL	
T	ACID ZINC S CHROME LEAD OTHER	
Q R		
		,
_	METHOD LANDFILL DESTRUCTION OF - 20 FINA	OTHER (SPECIFY)
P	NAME OF	FEDERAL TAX
l	COMPANY TOWNSIND/TI-VTROW	1. D. NUMBER 05-03/54/8
	6600 So. Ook PARK AVE. CHICAGO, 30	12 60638
W		DATE REMOVED TIME REMOVED
5 T	TYPE OF INDUSTRY COST HAMA) NO	T-12-84 130 m
E	I certify that the described waste, in the designated volume, was removed from this location	on by the contractor named below for legal
Į	disposal.	PHONE
	SIGNATURE OF AUTHORIZED AGENT	1 1
L	AND TITLE Congression Congression	312-735-1174
_	NAME :	FEDERAL TAX
	BROWNING-FFREIS JAD.	1. D. NUMBER
l	ADDRESS	DATE RECEIVED TIME RECEIVED
	5050 W. Larter ST. MALROSE PORK	5-22-84 /30 an
	WASTE HAULER'S STATE TRUCK	SE NO. (- 284c)
	REGISTRATION NO. / 1// 1 / 1 / 1	
	I certify that the described waste, in the designated volume, was removed from the above	i location and delivered to the disposal site
	designated below. SIGNATURE OF CONTRACTOR'S	PHONE DE COMPANY
	AGENT AND TITLE	F 775 77 11
Щ		
Г	NAME	FEDERAL TAX 1. D. NUMBER
1	CHOPS-CLOSE	DATE RECEIVED TIME RECEIVED
	11800 STUNEY TS. CHICA 3766 60617 I certify that the above named contractor delivered the described waste, in the designate	
1	11860 STONEY TS. CHILD TO THE BOOK IN THE DESIGNATION OF THE PROPERTY OF THE P	
		d volume to this tacility and some was received i
	I certify that the above named contractor delivered the described waste, in the designated for lawful disposition as designated.	d volume to this facility and some was received



METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGO

NO. 078450

INDUSTRIAL WASTE DIVISION (312) 751-5697

INDUSTRIAL WASTE/SLUDGE GENERATION, SHIPMENT AND DISPOSAL RECORD

	INDUSTRIAL TRACE, GLOBOL GLILLIANS	
	TYPE OF BULK	OTHER (SPECIFY)
E	WASTE DIQUID SLUDGE SOUD CONTAINER TRUCK) DRUMS	GALS GALS
Ň	WASTE CONTAINS:	CU YOS.
R		LBS.
A	FATS, OILS OR GREASE CYANIDE COPPER NICKEL MERC	URY
Ţ	ACID ZINC CHROME LEAD OTHE	,
I O		CITY RICKOUSSED
"	ALKAU CADMIUM RON SELENIUM (SPE	KILKORE SOL
	DISPOSAL DESTRUCTION	OTHER
Ιo	LANDEN LANDEN LANDEN	(SPECIFY)
F	NAME OF	I. D. NUMBER 05-03/5 768
	COMPANY TO WAS FWD THY RUN	03-03/3 76/
İ	LOCATION OI OI OI	1 /1/2
w	66 w &. Out Back NV. CA. caco, IL	C. 66634 DATE REMOVED TIME REMOVED
S	I TYPE OF	4 1 - 1
Ť	HOUSTRY (OLD HAZADINE	6-6-84 1/25 AM
E	I certify that the described waste, in the designated volume, was removed from this locati	on by the contractor named below for legal
	disposal.	
١	SIGNATURE OF /	PHONE
	AUTHORIZED AGENT	735-1134
Щ	ANDTHE	
	Trans.	FEDERAL TAX
	NORTH BRANCH WASTE O.C	I. D. NUMBER
	NORTH PRANCT WASE	DATE RECEIVED TIME RECEIVED
i	20 Box 1660 SONICER FORK	6-6-84 11:30
l	P.O. Buy 1660 SOHICCE BARK	
l	I TABLE HAVEEN S	K ISE NO.
1	REGISTRATION NO.	
	I certify that the described waste, in the designated volume, was removed from the abov	e location and delivered to the disposal site
	designated below.	
1	SIGNATURE OF CONTRACTOR'S	PHONE
l	AGENT AND TITLE KILL OLD J	
_		
		FEDERAL TAX
_	I NAME	
	Prender ParDUCTS	I. D. NUMBER
	Prfintry Products	DATE RECEIVED TIME RECEIVED
	4256 Wesly SchillER Park	DATE RECEIVED TIME RECEIVED
	I certify that the above named contractor delivered the described waste, in the designate	
	I certify that the above named contractor delivered the described waste, in the designate for lawful disposition as designated.	DATE RECEIVED TIME RECEIVED and volume to this facility and same was received
	I certify that the above named contractor delivered the described waste, in the designate	DATE RECEIVED TIME RECEIVED



METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGO 100 EAST ERIP STREET * CHICAGO, IL 60611

NO. 078451

INDUSTRIAL WASTE DIVISION (312) 751-5697

INDUSTRIAL WASTE/SLUDGE GENERATION, SHIPMENT AND DISPOSAL RECORD

	INDUSTRIAL WASTE/SEDDE GENERATION, SIM MENT AND DISTORT	
	TYPE OF TYPE OF BULK	OTHER (SPECIFY)
	WASTE DE LIQUID SLUDGE SOLID CONTAINER X (TRUCK) DRUMS	S CALS
Zu	WASTE CONTAINS:	CU. YDS.
R	· · · · · · · · · · · · · · · · · · ·	LBS.
Ť	FATS, OILS OR GREASE CYANEDE COPPER NICKEL MERCUI	RY .
ြင်	ACID ZINC Y CHROME LEAD OTHER	
₽	ALKALI CADMIUM JIRON SELENIUM (SPECI	₽ Y)
l _	DISPOSAL METHOD & LANDFILL DESTRUCTION OF THE PROPERTY OF THE	OTHER (SPECIFY)
P	NAME OF	FEDERAL TAX
	COMPANY TOWARD TO TOO SON	1. D. NUMBER 05-03/5468
	LOCATION	
w	6600 Si. Oak Pack AVV. (Hinsel)	TL. 60638
A S	TYPE OF	ATE REMOVED TIME REMOVED
Ť	INDUSTRY (OLL) ASTRODING	0-29-84 1200
E	I certify that the described waste, in the designated volume, was removed from this locatio	n by the contractor named below for legal
	disposal.	
	SIGNATURE OF	PHONE
	AUTHORIZED AGENT AND TITLE	735-1134
Г	NAME	FEDERAL TAX I. D. NUMBER
1	BROWNING PERRIS	
	ADDRESS	DATE RECEIVED TIME RECEIVED
	5050 W. LAKE ST. MALROSE BARK	6-29-89 1123
	WASTE HAULER'S STATE TRUCK	1/ 1/:
	REGISTRATION NO. 0/07036 IL. BICENS	
	I certify that the described waste, in the designated volume, was removed from the above	location and delivered to the disposal site
	designated below.	
	SIGNATURE OF CONTRACTOR'S	PHONE
L_	AGENT AND TITLE	393-55/
	NAME OF THE OF T	FEDERAL TAX
	CHEST CLEAR	DATE RECEIVED TIME RECEIVED
	ADDRESS OF THE PROPERTY OF THE	DATE DECEIVED
	11800 STONEY A. CHINAGO, IC.	
	I certify that the above named contractor delivered the described waste, in the designated	i volume to this facility and same was received
	for lawful disposition as designated.	
	SIGNATURE OF OPERATOR PERMIT NO.	PHONE
	AND TITLE	I



METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGO 100 EAST ERIE STREET . CHICAGO, IL 60611

NO. 078452

INDUSTRIAL WASTE DIVISION (312) 751-5697

INDUSTRIAL WASTE/SLUDGE GENERATION, SHIPMENT AND DISPOSAL RECORD

	VOLUME
TYPE OF SULK TANK) DRUMS	OTHER (SPECIFT)
WASIE TO THE TOTAL	4 330,000 GALS
WASTE CONTAINS:	YDS.
	L\$S.
A	RCURY
T ACID ZINC CHROME LEAD OT	MER
	PECIFITY I CHLOROLPHYLYNE
	74.00.000.000.000
DISPOSAL DESTRUCTION METHOD & LANDFILL ISPECIEY)	OTHER (SPECIFY)
	FEDERAL TAY
COMPANY TOWN SAND TEXTRON	I. D. NUMBER \$5-03/5468
LOCATION	
w 6600 So. Onk Brak AVE CHINASS.	Il. 60638
A	DATE REMOVED TIME REMOVED
S TYPE OF ROLD HANDING	
I certify that the described waste, in the designated volume, was removed from this local	tion by the contractor named below for legal
disposal	
SIGNATURE OF	PHONE
AND TITLE	735-1134
I AND ITTE	
NAME	FEDERAL TAX
Droke Mamient 60.	I. D. NUMBER
	DATE RECEIVED TIME RECEIVED
STATE TRI	07-02-84 8:25
WASTE HAULER'S STATE TRI	UCK
	TENSE NO. 24 529
I certify that the described waste, in the designated volume, was removed from the abo	ove location and delivered to the disposal site
1 1	
designated below.	PHONE
AGENT AND TITLE SUMMER RESIDENCE RES	312-345-3866
AGENT AND TITLE Slowed Would	3/0-3/1 3006
	FEDERAL TAX
NAME OF THE PROPERTY OF THE PR	I. D. NUMBER #
Derey Chanient Co.	DATE RECEIVED TIME RECEIVED
ADDRESS	57.2 112321723
2537 LEMOYNG MILKOSE TK	
I certify that the above named contractor delivered the described waste, in the designa	ted volume to this tacility and same was received
for lawful disposition as designated.	
SIGNATURE OF OPERATOR PERMIT NO.	PHONE
	I
AND TITHE	



INDUSTRIAL WAŞTE DIVISION (312) 751-5697

INDUSTRIAL WASTE SHIPSE GENERATION SHIPMENT AND DISPOSAL RECORD

	INDUSTRIAL WASTE/SLODGE GENERATION, STITMENT AN	D DIO. COAL NECES	
	TYPE OF TYPE OF	3-OTHER (SPECIFY)	AOTOWE
	WASTE 1-LIQUID 2-SLUDGE 3-SOLID CONTAINER TO TRUCK		7500 1-GALS
į	WASTE CONTAINS:	,	7-20s
			14,2503-LBS
t v	01-FATS, OILS OR GREASE DA-CYANIDE 707-COPPER 10-NICKEL	13-MERCURY	
E	02-ACID 05-ZINC 08-CHROME 11-LEAD	14-SOLVENTS 16-01	HER (SPECIFY)
A	09- IRON 12-SELENI	UM 15-PAINT RESIDUE	
T	03-ALKALI	was a second sec	
R	DISPOSAL DESTRUCTION	OTHER	
•••	METHOD LANDFILL (SPECIFY)		ATMENT.
	NAME OF	FEDERAL TAX	
0	COMPANY TOWNSEND DIVISION OF TEXTREA	FEDERAL GENERATOR	
F	LOCATION		(110010
	66005. OAK PARK DE . G. HICAGO, ILL	. 60638 03769	6400 / 0 TIME REMOVED
	TYPE OF	9-14-84	11 - Am
W	MOUSTRY RIVET MANUFACTURING.		
S	I certify that the described waste, in the designated volume, was remove	d from this location by the contractor n	amed below for legal
Ť	disposal.		
E	SIGNATURE OF	NA. ENEY QA MONE	
	AUTHORIZED AGENT	3/2-	735-1139
L			
_	NAME	FEDERAL TAX	_
	ENVIRITE CORP.	1. D. NUMBER 23/	895765
	ADDRESS	DATE RECEIVED	TIME RECEIVED
	16435 S. CENTER, HARVEY, ILL.	60426 9-14-84	11 - Am
ŀ	FEDERAL HAULER STATE	TRUCK	
l	I O NUMBER	LICENSE NO. 7790:	5 =
	107/009 1 certify that the described waste, in the designated volume, was remove	of from the above location and delivere	d to the disposal site
	l '		·
	designated below.	PHONE	
	SIGNATURE OF CONTRACTOR'S	0.450 312.5	76-7040
<u> </u>	AGENT AND TITLE Kovald Vloeshuan (D)	KIVER) JOIK S	
		FEDERAL TAX	
İ	NAME	i. D. NUMBER 2 3/	1895 765
	ENVIRITE CORP.	THE DATE RECEIVED	TIME RECEIVED
ĺ	ADDRESS 60426 FEDERAL DISPOSAL I.D. NUMBER	****	#
	16435 CENTER HARVEY, ILL. 031	in the designated volume to this facility	v and same was received
l	I certify that the above named contractor delivered the described waste	, in the designated volume to this focus	,
Ì	for lawful disposition as designated.	RMIT NO. PHONE	

TEXTRON

Textron Inc.

40 Westminster Street Providence, R.I. 02903 401/421-2800

March 29, 1985

Mr. Andrew A. Vollmer Illinois Environmental Protection Agency Division of Land Pollution Control Permit Section-Financial Assurance 2200 Churchill Road Springfield, IL 62706

Re: Townsend Division of Textron Inc. 03166410 - Cook County - Chicago/Textron ILD 042843854/Log #FA 129

Dear Mr. Vollmer:

In compliance with the State of Illinois 35 ILL. Adm. Code 725, we are hereby enclosing the following:

- 1. Letter from Textron's Chief Financial Officer which demonstrates the financial test for liability coverage (sudden and non-sudden) and assurance of closure care (with Exhibit B).
- 2. Letter dated March 29, 1985 from Arthur Young and Company as to the financial information contained in the letter referenced to in paragraph (1) above.
- 3. A copy of the 1984 Annual Report of Textron Inc., containing a report by Arthur Young and Company on Textron's financial statements for the fiscal year ended December 29, 1984.

If you require anything additional, please let me know.

Very truly yours,

James M. Barr Assistant Manager

Property and Casualty Insurance

JMB/ehb enclosure

cc: Andrew Spacone - Textron (w/enclosures)
Mac Wilson - Townsend (w/enclosures)
H. A. Schult - Arthur Young & Co. (w/enclosures)

LETTER FROM CHIEF FINANCIAL OFFICER

(To demonstrate liability coverage and/or to demonstrate both liability coverage and assurance of closure and/or post-closure care.)

Textron Inc., 40 Westminster Street, Providence, RI 02903

Director Illinois Environmental Protection Agency 2200 Churchill Road Springfield, Illinois 62706

I am the chief financial officer of

Dear Sir or Madam:

This letter is in	support of the use of the financial test to demonstrate financial respons	ibility i	or liability	coverage and clos	ure care
	as specified in Subpart H of 40				(2)
Administrative	Code Parts 724 and 725.				
financial test sp	erator identified above is the owner or operator of the following facilities for pecified in Subpart H of 40 CFR Parts 264 and 265 and/or tests equivalent Code Parts 724 and 725:	for which at or su	ch liability bstantially	coverage is being demon equivalent, and/or Sub	strated through the part H of 35 Illinois
USEPA I.D. No	ILD042843854				
Name	Townsend Division of Textron Inc. (3)				
Address	6600 Oak Park Avenue, Chicago, Illinois 60	638		····	
•					•
Please attach a	separate page if more space is needed for all facilities.				
See Instructio	n (4)				
through	n is the owner or operator of the following facilities for which financial a the financial test specified in Subpart H of 35 Ill. Adm. Code Parts 724 a by the test are shown for each facility: (LIST ALL THE ILLINOIS FACI	nd 725	. The curren	nt closure and/or post-cl	osure cost estimates
USEPA I.D. No	o. ILD042843854		losure nount	Post-Closure Amount	Closure and Post-Closure Amounts
Name To	wnsend Division of Textron Inc.				
Address 66	22,1202411				
City Ch	00 Oak Park Avenue	_ \$_	-0-	\$10,000	\$10,000
USEPA I.D. N		_ \$ <u></u>	-0-	\$10,000	\$10,000
	00 Oak Park Avenue icago, Illinois 60638	- _ <u>\$</u> -	-0-	\$10,000	\$10,000
COLL A L.D. IV	00 Oak Park Avenue icago, Illinois 60638	<u>\$</u>	-0-	\$10,000	\$10,000
	00 Oak Park Avenue icago, Illinois 60638	<u>\$</u>	-0-	\$10,000	\$10,000
	00 Oak Park Avenue icago, Illinois 60638	- - -	-0-	\$10,000	\$10,000
Name No	00 Oak Park Avenue icago, Illinois 60638	- - -	-0-	\$10,000	\$10,000

This Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter 111 1/2, Section 21(f). Disclosure of this information is required. Failure to do so may result in a civil penalty not to exceed \$25,000 per day of violation. Falsification of this information may constitute a Class 4 felony, which also carries a fine of up to \$25,000 per day of violation for the first offense. This form has been approved by the Forms Management Center.

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CEDA ED M	Closure	Post-Closure	Post-Closur
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SEPA I.D. No.	Closure Amount	Post-Closure Amount (7)	Post-Closs Amoun
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ddress ity SEPALD. No. ame See Attached Exhibit B ddress ity lease attach a separate page if more space is needed for all facilities. This firm is the owner or operator of the following hazardous waste manage posal facility, post-closure care, is NOT demonstrated either to IEPA, US assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or rent closure and/or post-closure cost estimates not covered by such financial	SEPA or a State throug or equivalent or substan assurance are shown fo	the financial test or tially equivalent state n reach facility: (LIST F	any other fina nechanisms. The
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ddress ity SEPA LD. No. ame See Attached Exhibit B ddress ity lease attach a separate page if more space is needed for all facilities. This firm is the owner or operator of the following hazardous waste manage posal facility, post-closure care, is NOT demonstrated either to IEPA, US assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or rent closure and/or post-closure cost estimates not covered by such financial AUTHORIZED STATES WHERE THERE IS NO STATE FINANCIAL ASSUSEPA LD. No. (5)	EPA or a State through requivalent or substant assurance are shown for EURANCE REQUIREM. Closure Amount	gh the financial test or tially equivalent state or each facility: (LIST FAENT) Post-Closure Amount	any other final nechanisms. The ACILITIES IN R Closure a Post-Closu
ddress ity SEPA LD. No. ame See Attached Exhibit B ddress ity lease attach a separate page if more space is needed for all facilities. This firm is the owner or operator of the following hazardous waste manage posal facility, post-closure care, is NOT demonstrated either to IEPA, US assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or rent closure and/or post-closure cost estimates not covered by such financial AUTHORIZED STATES WHERE THERE IS NO STATE FINANCIAL ASSUES AUTHORIZED STATES WHERE THERE IS NO STATE FINANCIAL ASSUES ALD. No.	EPA or a State through requivalent or substant assurance are shown for EURANCE REQUIREM. Closure Amount	gh the financial test or tially equivalent state or each facility: (LIST FAENT) Post-Closure Amount	any other final nechanisms. The ACILITIES IN R Closure a Post-Closs Amount

Please attach a separate page if more space is needed for all facilities.

Alternative II

1.	Sum or current closure and post-closure cost estimates (total of all cost estimates listed above)	\$_	2,172,677
2.	Amount of annual aggregate liability coverage to be demonstrated	\$_	8,000,000
3.	Sum of lines 1 and 2	\$_	10,172,677
4.	Current bond rating of most recent issuance and name of rating service		BBB-S&P
5.	Date of issuance of bond		June 15, 1980
6.	Date of maturity of bond		June 15, 2005
¢7.	Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	\$_	1,205,873,000
*8.	Total assets in the U.S. (required only is less than 90% of assets are located in the U.S.)	\$_	1,889,000,000
			Yes No
9.	Is line 7 at least \$10 million?		X /
. 10.			X
*11.	Are at least 90% of assets located in the U.S.?		X
	If not, complete line 12.	•	v
12.	Is line 8 at least 6 times line 3?	• • •	<u>X</u> /

Signature

Typed name Dennis G. Little

Title Executive Vice President and Chief Financial Officer

Data 3/29/85

Alternative I

1.	Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	\$		
2.	Amount of annual aggregate liability coverage to be demonstrated	8	-	
3.	Sum of lines 1 and 2	\$		·,······
*4.	Total liabilities (if any portion of your closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6)	\$		·
* 5.	Tangible net worth	\$		
*6.	Net worth	\$		·
*7.	Current assets	\$	······································	
* 8.	Current liabilities	\$		
9.	Net working capital (line 7 minus line 8)	\$		
10.	The sum of net income plus depreciation, depletion, and amortization	\$		
11.	Total assets in U.S. (required only if less than 90% of assets are located in the U.S.)	\$		
	The many in the contract and a second at the contract the fire contract the contrac	4		
			Yes	No
12. 13. 14. 15. 16. 17.	Is line 5 at least \$10 million? Is line 5 at least 6 times line 3? Is line 9 at least 6 times line 3? Are at least 90% of assets located in the U.S.? If not, complete line 16. Is line 11 at least 6 times line 3? Is line 4 divided by line 6 less than 2.0? Is line 10 divided by line 4 greater than 0.1?		Yes	No
12. 13. 14. 15. 16. 17.	Is line 5 at least \$10 million? Is line 5 at least 6 times line 3? Is line 9 at least 6 times line 3? Are at least 90% of assets located in the U.S.? If not, complete line 16. Is line 11 at least 6 times line 3? Is line 4 divided by line 6 less than 2.0?		Yes	No
12. 13. 14. 15. 16. 17. 18. 19.	Is line 5 at least \$10 million? Is line 5 at least 6 times line 3? Is line 9 at least 6 times line 3? Are at least 90% of assets located in the U.S.? If not, complete line 16. Is line 11 at least 6 times line 3? Is line 4 divided by line 6 less than 2.0? Is line 10 divided by line 4 greater than 0.1?		Yes	No
12. 13. 14. 15. 16. 17. 18. 19.	Is line 5 at least \$10 million? Is line 5 at least 6 times line 3? Is line 9 at least 6 times line 3? Are at least 90% of assets located in the U.S.? If not, complete line 16. Is line 11 at least 6 times line 3? Is line 4 divided by line 6 less than 2.0? Is line 10 divided by line 4 greater than 0.1? Is line 7 divided by line 8 greater than 1.5?		Yes	No

Alternative I

Amount of annual aggregate liability coverage to be demonstrated		
Current assets		
Current liabilities \$		P-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1
Net working capital (line 2 minus line 3)		
Tangible net worth		
. If less than 90% of assets are located in the U.S., give total U.S. assets		
II less than 50% of absets are rocated in the 0.5., give total 0.5. assets		
	Yes	No
. Is line 5 at least \$10 million?		·/
Is line 5 at least 6 times line 1?		/
Are at least 90% of assets located in the U.S.?		/
If not complete line 11.		
. Is line 6 at least 6 times line 1?		-/
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yped name		
Title		
THE		
Date		
art A. Liability Coverage for Accidental Occurrences (See Instruction 12 and (13)		
art A. Liability Coverage for Accidental Occurrences (See Instruction 12 and (13) Alternative II		
Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated		
Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated		
Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated		
Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated \$		·
Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated 2. Current bond rating of most recent issuance and name of rating service 3. Date of issuance of bond 4. Date of maturity of bond *5. Tangible net worth \$		·
Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated \$		• • • • • • • • • • • • • • • • • • • •
Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated 2. Current bond rating of most recent issuance and name of rating service 3. Date of issuance of bond 4. Date of maturity of bond *5. Tangible net worth \$		
Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated 2. Current bond rating of most recent issuance and name of rating service 3. Date of issuance of bond 4. Date of maturity of bond *5. Tangible net worth \$	Yes	No
Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated 2. Current bond rating of most recent issuance and name of rating service 3. Date of issuance of bond 4. Date of maturity of bond *5. Tangible net worth \$	Yes	No
Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated 2. Current bond rating of most recent issuance and name of rating service 3. Date of issuance of bond 4. Date of maturity of bond *5. Tangible net worth *6. Total assets in U.S. (required only if less than 90% of assets are located in U.S.) 7. Is line 5 at least \$10 million? 8. Is line 5 at least \$10 million? 8. Is line 5 at least 90% of assets located in the U.S.?	Yes	No
Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated 2. Current bond rating of most recent issuance and name of rating service 3. Date of issuance of bond 4. Date of maturity of bond *5. Tangible net worth *6. Total assets in U.S. (required only if less than 90% of assets are located in U.S.) *8. Is line 5 at least \$10 million? 8. Is line 5 at least \$0 million? 8. Are at least 90% of assets located in the U.S.?	Yes	No
Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated 2. Current bond rating of most recent issuance and name of rating service 3. Date of issuance of bond 4. Date of maturity of bond *5. Tangible net worth *6. Total assets in U.S. (required only if less than 90% of assets are located in U.S.) 7. Is line 5 at least \$10 million? 8. Is line 5 at least \$10 million? 9. Are at least 90% of assets located in the U.S.?	Yes	No
Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated 2. Current bond rating of most recent issuance and name of rating service 3. Date of issuance of bond 4. Date of maturity of bond *5. Tangible net worth *6. Total assets in U.S. (required only if less than 90% of assets are located in U.S.) *7. Is line 5 at least \$10 million? 8. Is line 5 at least \$10 million? 8. Is line 5 at least \$0 of assets located in the U.S.? *6. Total assets in U.S. (required only if less than 90% of assets are located in U.S.)	Yes	No
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Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated \$ 2. Current bond rating of most recent issuance and name of rating service \$ 3. Date of issuance of bond \$ 4. Date of maturity of bond \$ *5. Tangible net worth \$ *6. Total assets in U.S. (required only if less than 90% of assets are located in U.S.) \$ 7. Is line 5 at least \$10 million? \$ 8. Is line 5 at least 6 times line 1? \$ *9. Are at least 90% of assets located in the U.S.? If not, complete line 10. 10. Is line 6 at least 6 times line 1?	Yes	No
Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated 2. Current bond rating of most recent issuance and name of rating service 3. Date of issuance of bond 4. Date of maturity of bond *5. Tangible net worth *6. Total assets in U.S. (required only if less than 90% of assets are located in U.S.) *8. Is line 5 at least \$10 million? 8. Is line 5 at least 6 times line 1? *9. Are at least 90% of assets located in the U.S.? If not, complete line 10. 10. Is line 6 at least 6 times line 1?	Yes	No
Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated \$ 2. Current bond rating of most recent issuance and name of rating service \$ 3. Date of issuance of bond \$ 4. Date of maturity of bond \$ *5. Tangible net worth \$ *6. Total assets in U.S. (required only if less than 90% of assets are located in U.S.) \$ 7. Is line 5 at least \$10 million? \$ 8. Is line 5 at least 6 times line 1? \$ *9. Are at least 90% of assets located in the U.S.? If not, complete line 10. 10. Is line 6 at least 6 times line 1?	Yes	No
Alternative II 1. Amount of annual aggregate liability coverage to be demonstrated 2. Current bond rating of most recent issuance and name of rating service 3. Date of issuance of bond 4. Date of maturity of bond *5. Tangible net worth *6. Total assets in U.S. (required only if less than 90% of assets are located in U.S.) *8. Is line 5 at least \$10 million? 8. Is line 5 at least 6 times line 1? *9. Are at least 90% of assets located in the U.S.? If not, complete line 10. 10. Is line 6 at least 6 times line 1?	Yes	No

Name	None	
Address		`
City		
Please attac	tach a separate page if more space is needed for all facilities.	
This owner	er or operator is required to file a Form 10K with	the Securities and Exchange Commission (SEC) for the latest
fiscal year.		
The fiscal y	year of this owner or operator ends on December 29, 1984	*. The figures for the following items marked with an asterisk
are derived Decen	ed from this owner's or operator's independently audited, year-end financial sember 29, 1984	tatements for the latest completed fiscal year, ended
	(11)	

USEPA I.D. No.

TEXTRON

Textron Inc.

40 Westminster Street Providence, Rd. 02903 -401/421-2800

CERTIFIED MAIL

July 15, 1983

RECEIVED

Regional Administrator
U.S. Environmental Protection Agency
Waste Management Branch
230 South Dearborn Street
Chicago, IL 60604

WASTE MANAGEMENT BRANCH

CONTRACTOR CO

Re: Updated Financial Requirements for Closure and Post-Closure and Non-Sudden Liability Coverage

Dear Sir/Madam,

Textron Inc., a diversified manufacturing company located in Providence, R.I., with a manufacturing Division within your region, is subject to RCRA regulations applicable to owners and operators of Hazardous Waste Treatment, Storage, and Disposal Facilities.

In compliance with RCRA regulations as outlined in 40 CFR 264 and 265 pertaining to the annually updated financial test information and inflation adjusted closure and post-closure costs, we submit the following on behalf of our Townsend Division located at 6600 Oak Park Avenue, Chicago, Illinois 60638:

- (1) Letter dated June 27, 1983 from the chief financial officer of Textron Inc. as specified in 40 CFR 264.151 (g) of the RCRA regulations;
- (2) A copy of the 1982 Annual Report of Textron Inc., containing a report by Arthur Young & Company on Textron's financial statements for the fiscal year ended January 1, 1983;
- (3) Letter dated June 27, 1983 from Arthur Young & Company as to the financial information contained in the letter referred to in paragraph (1) above.

Please contact me if you require additional information.

Very truly yours,

James M. Barr Insurance Analyst Property and Casualty

JMB/ad enclosures

Cc: Susann Mark - Corporate (w/enclosures)
Paul J. Bergman - Townsend
H. A. Schult - Arthur Young & Company (w/enclosures)



Textron Inc.

40 Westminster Street Providence, R.I. 02903 401/421-2800

June 27, 1983

Regional Administrator
U.S. Environmental Protection Agency
Waste Management Branch
230 South Dearborn Street
Chicago, IL 60604

Re: Updated Financial Assurance Requirements Demonstrating Financial Responsibility for Liability Coverage (Non-Sudden) and Closure and Post-Closure Care

Dear Sir/Madam,

I am the chief financial officer of Textron Inc., 40 Westminster Street, Providence, Rhode Island 02903. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities listed on Exhibit A hereto for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265.

- The owner or operator identified above owns or operates the following facilities listed on Exhibit B hereto for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility.
- The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities listed on Exhibit C hereto owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility.
- 3. In states where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities listed on Exhibit D hereto through the test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility.



Financial Assurance Requirements June 27, 1983 Page Two

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a state through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent state mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on the Saturday nearest to the thirty-first day of December in each year, whether such Saturday falls in December or in January. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended January 1, 1983.

ALTERNATIVE II

1.	Sum of current closure and post-closure cost estimates (total of <u>all</u> cost estimates listed above)	\$ 1,977,421
2.	Amount of annual aggregate liability coverage to be demonstrated	\$ 6,000,000
3.	Sum of lines 1 and 2	\$ 7,977,421
*4.	Current bond rating of most recent issuance and name of rating service	A-3 - Moody's
*5.	Date of issuance of bond	June 15, 1980
*6.	Date of maturity of bond	June 15, 2005
*7.	Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	\$ 1,326,346,000
*8.	Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.	\$ 1,739,000,000

Financial Assurance Requirements June 27, 1983 Page Three

		YES	NO
9.	Is line 7 at least \$10 million?	X	
10.	Is line 7 at least 6 times line 3?	X	
*11.	Are at least 90% of assets located in the U.S.? If not, complete line 12		X
12.	Is line 8 at least 6 times line 3?	X	*

*As of 1/1/83

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

Yours truly,

William J. Ledbetter Executive Vice President Finance and Planning

Dated: 6/27/83

WJL/ad

	Location	EPA#
Sheaffer Eaton	301 Avenue H Ft. Madison, IA	IAD005267745
Homelite	Little Mountain Road Gastonia, NC 28052	NCD091249417
Bridgeport Machines	500 Lindley Street Bridgeport, CT 06601	CTD0072134927
	Atlantic Street Bridgeport, CT 06601	CTD00841320
E-Z-Go	Marvin Griffin Road Augusta, GA 30913	GAD003302064
Spencer Kellogg	6401 Chemical Road Baltimore, MD 21226	MDD069377042
	400 Doremus Avenue Newark, NJ 07105	NJD092217892
Bell Helicopter	600 E. Hurst Blvd. Ft. Worth, TX 76053	TXD980626006
	Plant 5 Highway 360 Avenue K Grand Prairie, TX 75050	TXD000764498
	Avenue Z at 5th St. Amarillo, TX 79120	TXD043160696
Bell Aerospace	2221 Niagara Falls Blvd. Wheatfield, NY 52627	NYD002106276
Townsend	P.O. Bos 6396 Columbia, SC 29260	SCD069326171
	6600 Oak Park Avenue Chicago, IL 60638	ILD042843854

	Location	EPA #	Closure Costs	Post Closure Costs
Sheaffer Eaton	301 Avenue H Ft. Madison, IA	IAD005267745	\$ 17,850	
Homelite	Little Mountain Road Gastonia, NC 28052	NCD091249417	26,250	
Bridgeport Machines	500 Lindley Street Bridgeport, CT 06601	CTD0072134927	4,395	
v	Atlantic Street Bridgeport, CT 06601	CTD00841320	394	
E-Z-Go	Marvin Griffin Road Augusta, GA 30913	GAD003302064	27,195	
Spencer Kellogg	6401 Chemical Road Baltimore, MD 21226	MDD069377042	78,750	
·	400 Doremus Avenue Newark, NJ 07105	NJD092217892	52,500	
Bell Helicopter	600 E. Hurst Blvd. Ft. Worth, TX 76053	TXD980626006	559,546	
	Plant 5 Highway 360 Avenue K Grand Prairie, TX 75050	TXD000764498	591,202	
	Avenue Z at 5th St. Amarillo, TX 79120	TXD043160696	69,139	
Bell Aerospace	2221 Niagara Falls Blvd. Wheatfield, NY 52627	NYD002106276	\$181,650	
Townsend	P.O. Bos 6396 Columbia, SC 29260	SCD069326171	\$315,000	\$52,500
	6600 Oak Park Avenue Chicago, IL 60638	ILD042843854	1,050	

	Location	EPA #	Closure Costs	Post Closure Costs
Bell Helicopter	600 E. Hurst Blvd. Ft. Worth, TX 76053	TXD980626006	558,480	
	Plant 5 Highway 360 Avenue K Grand Prairie, TX 75050	TXD000764498	590,076	
	Avenue Z at 5th St. Amarillo, TX 79120	TXD043160696	69,008	

	Location	EPA#	Closure Costs	Post Closure Costs
Sheaffer Eaton	301 Avenue H Ft. Madison, IA	IAD005267745	\$ 17,816	
Spencer Kellogg	6401 Chemical Road Baltimore, MD 21226	MDD069377042	78,600	
Homelite	Little Mountain Road Gastonia, NC 28052	NCD091249417	26,200	
E-Z-Go	Marvin Griffin Road Augusta, GA 30913	GAD003302064	27,143	
Townsend	P.O. Bos 6396 Columbia, SC 29260	SCD069326171	\$314,400	\$52,400
Bell Helicopter	600 E. Hurst Blvd. Ft. Worth, TX 76053	TXD980626006	558,480	
	Plant 5 Highway 360 Avenue K Grand Prairie, TX 75050	TXD000764498	590,076	
	Avenue Z at 5th St. Amarillo, TX 79120	TXD043160696	69,007	
Bridgeport Machines	500 Lindley Street Bridgeport, CT 06601	CTD0072134927	4,387	·
	Atlantic Street Bridgeport, CT 06601	CTD00841320	393	

ARTHUR YOUNG

ARTHUR YOUNG & COMPANY 277 PARK AVENUE NEW YORK, NEW YORK 10172

June 27, 1983

The Board of Directors Textron Inc.

We have examined the consolidated financial statements of Textron Inc. for the year ended January 1, 1983 and have issued our report thereon dated February 8, 1983. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

We have read the letters dated June 27, 1983 from William J. Ledbetter, chief financial officer of Textron Inc., submitted to the Regional Administrators of the Environmental Protection Agency in support of the use of the financial test, as specified in Subpart H of 40 CFR Parts 264 and 265, to demonstrate financial assurance for closure and post-closure care of the Corporation's hazardous waste facilities at the locations listed in those letters.

In connection with Subpart H of 40 CFR Parts 264 and 265, we have compared the independently audited consolidated financial statements of Textron Inc. for the year ended January 1, 1983, the latest fiscal year, to the data in those letters indicated as being derived from such independently audited financial statements. In connection with this comparison, no matters came to our attention that caused us to believe that the specified data should be adjusted.

This report is solely to assist you in complying with the reporting requirements associated with the financial test, as specified in Subpart H of 40 CFR Parts 264 and 265, to demonstrate financial assurance for the closure and post-closure care and should not be referred to or used for any other purpose.

Ather Houng & Company



Textron Inc.

40 Westminster Street Providence, R.I. 02903 401/421-2800

January 14, 1983

CERTIFIED MAIL

Regional Administrator U.S. Environmental Protection Agency Waste Management Branch 230 South Dearborn Street Chicago, IL 60604

Re: Financial Requirements for Closure and Post-Closure

and Non-Sudden Liability Coverage

Dear Sir/Madam,

Textron Inc., a diversified manufacturing company headquartered in Providence, R.I. with a manufacturing Division within your region, is subject to RCRA regulations applicable to owners and operators of Hazardous Waste Treatment, Storage, and Disposal Facilities.

In response to liability requirements as set forth in 40 CFR Section 264.151(g) as respects non-sudden liability coverage for our Townsend Division located at 6600 Oak Park Avenue, Chicago, IL 60638, we submit the following in compliance with the referenced RCRA requirement:

- (1) Letter dated January 13, 1983 from the chief financial officer of Textron Inc. as specified in 40 CFR 264.151(g) of the RCRA regulations;
- (2) A copy of the 1981 Annual Report of Textron Inc., containing a report by Arthur Young & Company on Textron's financial statements for the fiscal year ended January 2, 1982;
- (3) Letter dated January 14, 1983 from Arthur Young and Company as to the financial information contained in the letter referred to in paragraph (1) above.

Please contact the undersigned if you require additional information.

Very truly yours,

James M. Barr Insurance Analyst

Property and Casualty

WASTE AMERICARDE BRANCH

EPA, REGION V

JMB/ad

enclosures

cc: Susann Mark - Corporate (w/enclosures)

Paul J. Bergman - Townsend

H. A. Schult - Arthur Young & Company (w/enclosures)



Textron Inc.

40 Westminster Street Providence, R.I. 02903 401/421-2800

January 13, 1983

Regional Administrator U.S. Environmental Protection Agency Waste Management Branch 230 South Dearborn Street Chicago, IL 60604

Re: Financial Assurance Requirements Demonstrating Financial Responsibility for Liability Coverage (Non-Sudden) and Closure and Post-Closure Care

Dear Sir/Madam,

I am the chief financial officer of Textron Inc., 40 Westminster Street, Providence, Rhode Island 02903. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities listed on Exhibit A hereto for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265.

- 1. The owner or operator identified above owns or operates the following facilities listed on Exhibit B hereto for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility.
- 2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities listed on Exhibit C hereto owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility.
- 3. In states where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities listed on Exhibit D hereto through the test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility.

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a state through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent state mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on the Saturday nearest to the thirty-first day of December in each year, whether such Saturday falls in December or in January. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended January 2, 1982.

ALTERNATIVE II

1.	Sum of current closure and post-closure cost estimates (total of <u>all</u> cost estimates listed above)	\$ 1,883,259		
2.	Amount of annual aggregate liability coverage to be demonstrated	\$ 6,000,000		
3.	Sum of lines 1 and 2	\$ 7,883,259		
*4.	Current bond rating of most recent issuance and name of rating service	A ⁺ (Standard and Poor)		
* 5.	Date of issuance of bond	June 15, 1980		
*6.	Date of maturity of bond	June 15, 2005		
7.	Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	\$ 1,179,100,000.00		
8.	Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.	\$ 1,799,000,000.00		

Financial Assurance Requirements January 13, 1983 Page Three

		YES	NO
9.	Is line 7 at least \$10 million?	X	
10.	Is line 7 at least 6 times line 3?	X	-
*11.	Are at least 90% of assets located in the U.S.? If not, complete line 12		X
12.	Is line 8 at least 6 times line 3?	X	

*As of 1/2/82

I hereby certify that the wording of this letter is identical to the wording specified in $40\ \text{CFR}\ 264.151(g)$ as such regulations were constituted on the date shown immediately below.

Yours truly,

William J. Ledbetter
Executive Vice President
Finance and Planning

Dated: JAN. 13 1983

WJL/ad

ARTHUR YOUNG

ARTHUR YOUNG & COMPANY 277 PARK AVENUE NEW YORK, NEW YORK 10172

January 13, 1983

The Board of Directors Textron Inc.

We have examined the consolidated financial statements of Textron Inc. for the year ended January 2, 1982 and have issued our report thereon dated February 9, 1982. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

We have read the letters dated January 13, 1983 from William J. Ledbetter, chief financial officer of Textron Inc., submitted to the Regional Administrators of the Environmental Protection Agency in support of the use of the financial test, as specified in Subpart H of 40 CFR Parts 264 and 265, to demonstrate financial assurance for closure and post-closure care and non-sudden liability coverage of the Corporation's hazardous waste facilities at the locations listed in those letters.

In connection with Subpart H of 40 CFR Parts 264 and 265, we have compared the independently audited consolidated financial statements of Textron Inc. for the year ended January 2, 1982, the latest fiscal year on which we have reported, to the data in those letters indicated as being derived from such independently audited financial statements. In connection with this comparison, no matters came to our attention that caused us to believe that the specified data should be adjusted.

This report is solely to assist you in complying with the reporting requirements associated with the financial test, as specified in Subpart H of 40 CFR Parts 264 and 265, to demonstrate financial assurance for the closure and post-closure care and non-sudden liability coverage and should not be referred to or used for any other purpose.

athen Young & Company



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

July 31, 1992

Mr. William Bettiga Litho-Graphic Metal Corp. 6600 South Oak Park Ave. Bedford Park, IL 60638

Re:

Visual Site Inspection

Litho-Graphic Metal Corp.

ILD 042 843 854

Dear Mr. Bettiga:

As indicated in the letter of introduction sent to you on July 24, 1991, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief

Minnesota/Ohio Technical Enforcement Section

RCRA Enforcement Branch

PRC Environmental Management, Inc. 233 North Michigan Avenue Suite 1621 Chicago, IL 60601 312-856-8700 Fax 312-938-0118

RECEIVED WMD RECORD CENTER

JAN 03 1995



PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

LITHO-GRAPHIC METAL CORP.
BEDFORD PARK, IL
ILD 042 843 854

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Waste Programs Enforcement Washington, DC 20460

Work Assignment No. : R05032

EPA Region : 5

 Site No.
 :
 ILD 042 843 854

 Date Prepared
 :
 June 26, 1992

 Contract No.
 :
 68-W9-0006

 PRC No.
 :
 109R05032IL11

Prepared by : B&V Waste Science and Technology Corp.

Ramona Reints

Telephone No. : (312) 346-3775

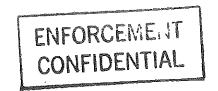
Contractor Project Manager : Shin Ahn

Telephone No. : (312) 856-8700 EPA Work Assignment Manager : Kevin Pierard Telephone No. : (312) 886-4448

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EXECUTIVE SUMMARY



B&V Waste Science and Technology Corp. (BVWST), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMUs) and other areas of concern (AOCs) at the Litho-Graphic Metal Corp. (Litho-Graphic) facility in Bedford Park, Illinois. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

The Litho-Graphic facility engages in metal decorating. This includes the coating or painting on metal, printing on metal and metal stamping. Litho-Graphic began operations at the current location in 1986 and employs 28 people at the present time. The facility operates as a small quantity generator.

The previous owner and operator of the facility was Textron, Inc. (TEXTRON). Textron manufactured rivets, solid rivets and specially cold formed metal products, generating plating waste and waste oil until 1985. Specific information regarding start—up dates and waste management practices of Textron could not be obtained from the company in a timely manner.

The PA/VSI identified the following five SWMUs and no AOCs at the facility:

Solid Waste Management Units

- 1. Indoor storage area of drummed hazardous waste.
- 2. Incinerator/afterburner.
- 3. Prior location of waste storage tanks.
- 4. Scrap metal hoppers and pallets.
- 5. Satellite accumulation area.

m this facility is low to

The potential for a release of hazardous constituents to groundwater from this facility is low to moderate. SWMUs which handle hazardous waste are inspected regularly and have sufficient release controls to minimize release potential. A previously used underground storage tank was removed but no data is available on tank integrity or sampling of surrounding soils. Groundwater is not used as the primary source of drinking water in the Chicago area. However, some private wells are used for industrial purposes within 0.25 mile of the facility.

ENFORCEMENT

The potential for a release of hazardous constituents to the surface water from the facility is low. The Des Plaines River is located two miles northwest of the facility and Lake Michigan is twelve miles northeast of the facility. There is no discharge of wastewater to storm sewers.

The potential for release of hazardous constituents to soils is low to moderate. No data is available on the above ground and below ground storage tanks when they were removed. Soil sampling is recommended.

The potential for a release of hazardous constituents to air is low. File documentation indicates that emissions from the incinerator/afterburner (SWMU 2) have been below permissible levels. No other potential air releases were noted.

Receptors of potential releases at the facility include Litho-Graphic employees and nearby residents. A fence surrounds the facility. No sensitive environments have been identified within two miles of the facility.

ES-2

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PAs) and visual site inspections (VSIs) of hazardous waste treatment and storage facilities in Region 5. B&V Waste Science and Technology Corp. (BVWST) was contracted by PRC to conduct the PA/VSI for the Litho-Graphic facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Litho-Graphic facility in Bedford Park, Illinois. The PA was completed on August 2, 1991. BVWST gathered and reviewed information from Illinois EPA and from EPA Region 5 RCRA files. The VSI was conducted on August 7, 1991. It included interviews with Carol and William Bettiga, facility representatives and a walk-through inspection of the facility. Four SWMUs and no AOCs were identified at the facility.

The VSI is summarized and inspection photographs are included in Attachment A. Field notes from the VSI are included in Attachment B.

2.0 FACILITY DESCRIPTION

2.1 FACILITY LOCATION

The Litho-Graphic facility is located at 6600 South Oak Park Avenue in the village of Bedford Park, Cook County, Illinois; Township 38 North, Range 13 East; Section 19, (latitude 41° 46' 220" and longitude 87° 49' 190") (Figure 1). The facility occupies approximately 3.5 acres in an industrial area.

The Litho-Graphic facility is bordered on the north by Viskase Corp., on the east by Oak Park Avenue, on the south by a railroad spur and Mor-Pak, Inc., and on the west be a vacant lot. Blair and St. Rene schools are located within four blocks of the facility.

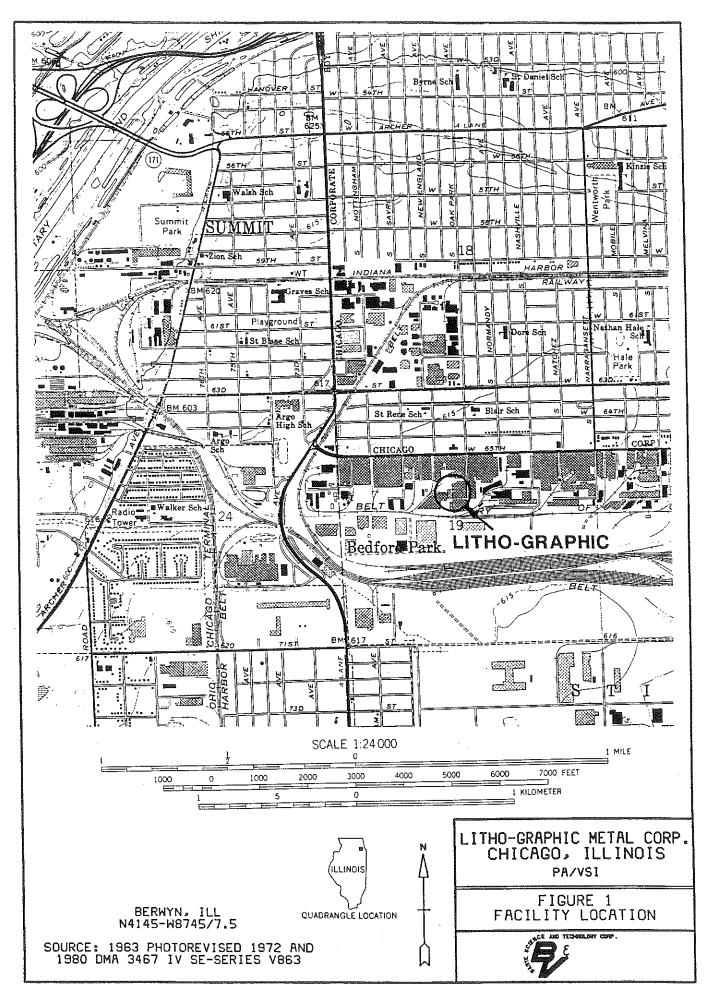
Litho-Graphic is surrounded by a security fence and is equipped with a security system. The site can be assessed only from Oak Park Avenue.

2.2 FACILITY OPERATIONS

The Litho-Graphic facility engages in metal decorating. This includes the activities of coating or painting on metal, printing on metal and metal stamping. These processes generate two to four drums of spent solvent each month. Full drums are temporarily stored in the paint room until they are taken off site. Litho-Graphic began operations at its current location in 1986 and employs 28 people. The facility consists of one building, which houses all operations, and a parking lot (Figure 2). Prior to 1986, the building was occupied Textron, Inc. (Textron), a manufacturer of tubular rivets, solid rivets and specialty cold formed metal products. Information regarding Textron's waste management practices is not readily available.

2.3 WASTE GENERATING PROCESSES

The waste streams generated at the Litho-Graphic facility are spent solvents, metal scraps, and waste gases. Waste solvent is generated when the coater/varnisher station is cleaned between coatings. Solvents which clean the coater/varnisher station include #82 thinner, consolve 150, methyl ethyl ketone, and mineral spirits. The spent solvent is collected in a drip pan under the station and poured from the drip pan into a 55 gallon drum (SWMU #5) which has been labelled and dated. When it is full, the 55 gallon drum is moved to the hazardous waste drum storage area (SWMU #1), within the paint room. Two to four drums of spent solvent are generated by this process each month. Every few months the drums



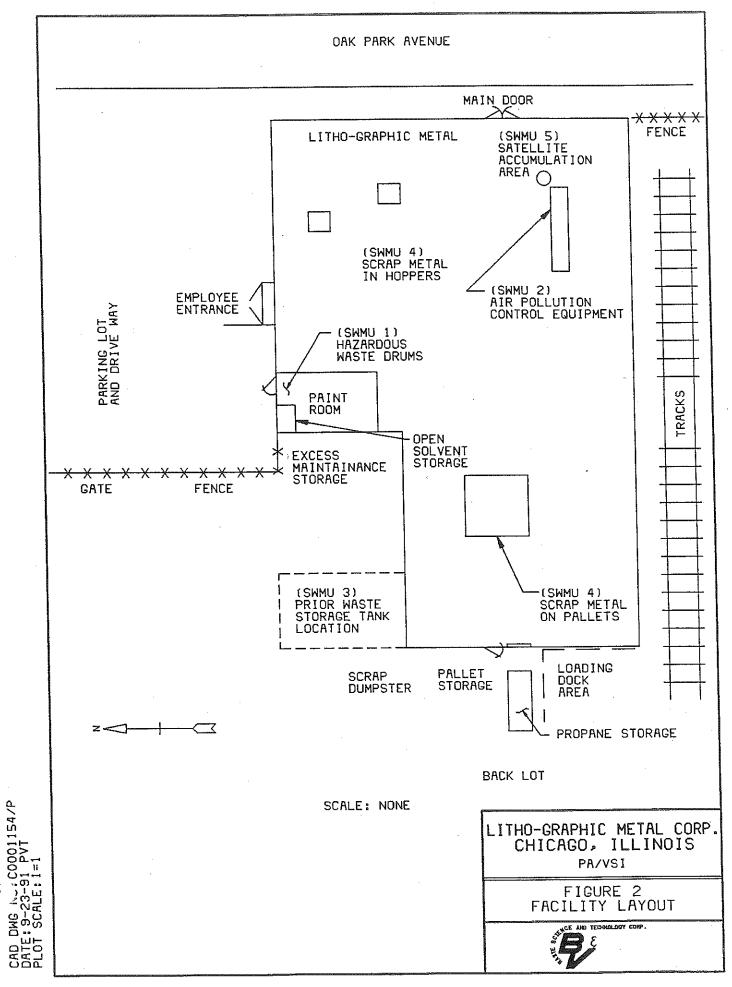


TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Hazardous Waste Drum Storage	No	Active
2	Incinerator/Afterburner	No	Active
3	Prior Waste Storage Tank Location	No**	Inactive
4	Scrap Metal Hoppers and Pallets	No	Active
5	Satellite Accumulation Area	No	Active

Note:

^{*} A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit.

^{**} Alleged protective filer.

are shipped offsite via Mr. Frank Environmental Services to Petro-Chem Processing Inc. in Detroit, Michigan, for solvent recovery and fuel blending.

Metal scraps are generated during the metal stamping process. Metal scraps are collected in hoppers, and on pallets (SWMU #4) and stored inside the building until they are sold to a scrap dealer.

Waste gases are generated when the oven is used to dry coatings onto the metal. The waste gases contain volatilized solvents used in the coatings. The solvents are blown into the incinerator afterburner from the oven and burned by two seven to eight million BTV burners (Bettiga, 1990) (SWMU #2). The off main coating heated is called GL-150. The incinerator/afterburner is 95% efficient (Bettiga, 1991).

During past operations of former occupant Textron, a plating waste and a waste oil were generated. Both of these wastes were stored in two 3,000 gallon tanks located in the parking lot (IEPA, 1982) (SWMU #3). The plating waste tank was above ground and the waste oil tank was below ground. According to the current owner, these tanks were removed as part of a contractual agreement between Textron and Litho-Graphic prior to Litho-Graphic's occupancy of the site. The prior location of these tanks is shown in photograph 3.

2.4 HISTORY OF DOCUMENTED RELEASE

There is no record of a release from solid waste management units at this facility. During the VSI, a strong solvent odor was present in the open solvent storage room. This room, which contains all opened drums of solvent, is located within the paint room. It is monitored by a LEL meter which activates an alarm and ventilation system when a certain level is exceeded.

2.5 REGULATORY HISTORY

On November 19, 1980 the previous owner and operator, Textron, submitted a Part A Permit Application for the storage of hazardous waste in tanks. Textron filed the Part A in the event they decided to store the tanked waste for more than 90 days, but now claims they were a protective filer and never operated as a storage facility during their occupancy at the site. In 1988, IEPA sent a letter to Textron requesting them to complete a Part A Withdraw Request Form. Textron did so, requesting their Part A be withdrawn and for the regulatory status of the site to be changed to generator (IEPA, 1988). On August 1, 1990, IEPA notified Textron that their Part A had been withdrawn (IEPA, 1990).

TABLE 2 SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit		
Spent Solvents/F003, F005	Cleaning Coating/Varnish Station	1, 5		
Scrap Metal	Metal Stamping Process	4		
Plating Wastes	Unknown	3		
Waste Oil	Unknown	3		

SWMU 3 is inactive unit

Litho-Graphic does not operate a storage facility and thus is subject to reduced requirements. Litho-Graphic was issued an operating permit for their air pollution control equipment on September 24, 1987 (IEPA, 1987). This equipment consists of one litho press station, one coating varnish station with oven and afterburner, one waxer and one boiler. On January 3, 1989, a joint construction and operating permit was issued to allow for an additional boiler (IEPA, 1989).

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and groundwater in the vicinity of the Litho-Graphic facility.

2.6.1 Climate

The climate of Chicago, Illinois is humid continental type. The average daily maximum temperature is 58.7°F, and the average daily minimum temperature is 39.7°F. Annual precipitation for the area is 33.34 inches. The highest 24-hour rainfall recorded was 9.35 inches occurring in August of 1987 (National Weather Bureau, 1991). The average snowfall is 38.2 inches (Ruffner, 1977).

2.6.2 Flood Plain and Surface Water

Surface water drainage in the area of the Litho-Graphic is to the west, toward the Des Plaines River approximately 2 miles west of the site. Runoff from precipitation goes to storm sewers which discharge to the Metropolitan Water Reclamation District.

The Litho-Graphic facility lies above the 500 year flood plain (FEMA, 1991).

2.6.3 Geology and Soils

The near-surface soil near Litho-Graphic has been classified as a nearly level, poorly drained soil resulting from the deposit of clay and silt in a glacial lake (USDA, 1979). There was no site specific soils information available for the Litho-Graphic facility.

2.6.4 Groundwater

The Litho-Graphic site is serviced by municipal water. Municipal water is originally taken from Lake Michigan. The nearest private wells in use for industrial purposes are located on the adjacent Viskase Corp. site. Layne-Western, the well company that currently maintains the wells, supplied BVWST with copies of the well logs (Appendix C). The logs indicate that the first bedrock layer was encountered at 93

feet, and the wells were drilled to 1582 feet and 1640 feet. The wells most likely terminate in a confined aquifer. The characteristics of groundwater flow beneath the Litho-Graphic facility is not known specifically.

Groundwater is obtained from four major aquifer systems in northeastern Illinois — the glacial drift system, the shallow bedrock system, and two deep bedrock systems. They are distinguished by their hydrologic properties and recharge source areas (Hughes et al., 1966). In central Cook County, the glacial drift is thin and sand and gravel deposits are correspondingly thin or are absent. Virtually all wells drilled will have to penetrate bedrock for groundwater supplies (Bergstrom et al., 1955).

The shallow bedrock aquifer system in northeastern Illinois underlies the glacial drift system and is mainly comprised of the Silurian dolomite formations. The upper boundary of this system is the bedrock-drift contact, and the lower boundary is the middle Ordovician age Galena-Platteville Dolomite. Water from this aquifer is obtained from fractures and solution opening in the Silurian dolomite beds (Hughes et al., 1966). The facility lies in an area where dolomite lies directly below the glacial drift which yields groundwater through open crevices and channels (Bergstrom et. al., 1955). The shallow bedrock aquifer system is recharged locally from precipitation (Hughes et al., 1968).

The deep bedrock aquifer systems include the Cambrian-Ordovician aquifer system and the Mt. Simon aquifer system. The Cambrian-Ordovician aquifer system contains two major aquifers, the Glenwood-St. Peter aquifer and the Ironton-Galesville aquifer. The top of the Cambrian Ordovician aquifer system is the Galena-Platteville Dolomite. The Glenwood-St. Peter aquifer is widely utilized where water requirements are less than 200 gallons per minute (gpm). This unit has a permeability between 9 to 15 gallons per day per square foot (gpd/sq. ft.). The Ironton-Galesville Sandstone aquifer has a permeability between 30 and 40 gpd/sq. ft. Recharge to the deep bedrock aquifer systems is mostly from west and north of the six county metropolitan area, where rocks crop out at the surface or lie immediately below the glacial drift. Minor recharge does occur through leakage downward through the shallow bedrock aquifer system (Hughes et al., 1966).

The Mt. Simon aquifer system is bounded above by the relatively impermeable shales and siltstones of the upper and middle Eau Claire Formation and below by the crystalline pre-Cambrian basement rock. The average permeability of the aquifer system is 16 gpd/sq. ft. (Hughes et al., 1966) and recharge is largely from the outcrop region of Cambrian rocks in central southern Wisconsin (Willman, 1971).

2.7 RECEPTORS

The Litho-Graphic facility occupies 3.5 acres of an industrial park in the village of Bedford Park, Illinois. Bedford Park is 6.5 square miles in area, with a population of 580 residents. Bedford Park has one grammar school (Village of Bedford Park).

The site is bordered on the north by Viskase Corp., on the east by Oak Park Avenue, on the south by a railroad spur and Mor-Pak, Inc., and on the west by a vacant lot. The nearest residence is located two blocks north of the facility and two schools are located four blocks north of the facility. The site is surrounded by a security fence and a security system has been installed. Access to the site is only achieved via Oak Park Avenue. The facility operates 10 to 11 hours a day Monday-Friday and half a day on Saturday.

The Des Plaines River and the Sanitary Ship Canal are located approximately 2 miles west of the facility. The Des Plaines River receives some recreational use. Area residents and industry are served by municipal water from Lake Michigan. Groundwater use in the area is for industrial purposes. Wells are located within 0.25 miles of the facility. There are no sensitive environments in the area.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the three SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented release, and observations.

SWMU 1

Hazardous Waste Drum Storage Area

Unit Description:

The hazardous waste drum storage area is a ten foot by ten foot area located in the Northeast corner of the paint room which has a capacity for approximately 12 drums (Photo 1). The paint room is a 38 foot by 30 foot room constructed of cinder block walls and concrete floors.

Approximately 100 drums of product are stored here. The floors of the room are recessed.

Date of Startup:

This unit began operation in 1987.

Date of Closure:

This facility is currently active. This SWMU is a less than 180 days storage area for spent solvents. Therefore, closure is not required.

Wastes Managed:

Spent solvents generated during cleaning of the coater/varnisher are stored on this unit. The solvents include #82 thinner, consolve 150, methyl ethyl ketone, and mineral spirits.

Release Controls:

This storage area is located within a cinder block walled room designed for containment. Doors are located 8 inches above the floor. Floor dry is present to absorb small spills immediately, should one occur.

History of

Documented Release:

No releases from this SWMU have been documented.

Observations:

The area contains drums of product and hazardous waste which are labelled and dated. Drums appeared to be in sound condition. No evidence of release was observed.

SWMU 2

Incinerator/Afterburner

Unit Description:

The incinerator/afterburner is designed to control emissions generated from the Litho-line #1 operation (Photo 2). Metal coatings are dried in the oven. Some of the solvents volatilize into the air stream, generating waste gas. The waste gas is blown into the incinerator/afterburner and destroyed by two burners. The burners each generate seven to eight million BTUs of heat. The unit has a 95% destruction efficiency.

Date of Startup:

This unit began operations in 1987.

Date of Closure:

This unit is currently active. The air pollution control equipment is currently permitted by IEPA. The permit expires December 27, 1993.

Wastes Managed:

The incinerator/afterburner destroys residual solvent from the drying oven. The primary coatings being dried is GL-150 (Bettiga, 1991). The specific constituents of this coating is proprietary information.

Release Controls:

The air pollution control equipment was designed to limit emissions (Bettiga, 1991).

History of

Documented Release:

There are no documented releases of VOCs emissions in excess of permitted levels.

Observations:

No evidence of release was observed.

SWMU 3

Prior Location of Waste Storage Tanks

Unit Description:

The prior location of waste storage tanks is a 25'x25' gravel area in the facility parking lot (Photo 3). Previously, two 3000 gallon tanks were located here, one above ground, one underground. The tanks stored plating waste and waste oil. Information regarding which tank stored which waste is not readily available.

Date of Startup:

The unit start up date is unknown, but assumed to be prior to 1980.

Date of Closure:

This unit never went through closure officially. Prior to the property sale

in 1986, Textron removed the tanks.

Wastes Managed:

Wastes that were managed at this SWMU were plating tank sludges and a waste oil trichlor waste stream (IEPA, 1982). Specific information on waste constituents could not be obtained from Textron.

Release Controls:

Release controls were not observed during the VSI.

History of

Documented Release:

Soil testing was not conducted at the time of tank removal. The soils, gravel and asphalt in the area appear to be free of any staining. There are no documented releases from this unit.

Observations:

There was no evidence of past spills from the tanks that were housed in this unit. However, there is no information on the integrity of the storage tanks or any sampling data from tank removal.

SWMU 4

Scrap Metal Hoppers and Pallets

Unit Description:

These units consists of scrap metal pieces stored in hoppers and scrap metal sheets stored on pallets (Photo 4). The pallets are stored near the rear door on the west side of the facility. The hoppers are located near the stamping operations on the east side of the facility (Photo 5).

Date of Startup:

This unit began operations in 1987.

Date of Closure:

This facility is currently active. There are no plans to close this SWMU.

Wastes Managed:

Scrap metal pieces and sheets.

Release Controls:

Release controls consist of keeping the waste metal indoors, protected from the weather.

History of

Documented Release:

No releases from this SWMU have been documented.

Observations:

Release from these units is unlikely since the metal is contained and stored

indoors, protected from the weather.

SWMU 5

Satellite Accumulation Area

Unit Description:

This unit consists of spent solvents collected in a drip pan and poured into

a nearby 55 gallon drum. This drum is located next to the litho-line

(Photo 6).

Date of Startup:

This unit began operations in 1987.

Date of Closure:

This facility is currently active. There are no plans to close this SWMU.

Wastes Managed:

Spent solvents (F003, F005) are managed in this SWMU.

Release Controls:

Release controls consist of keeping the waste drums covered and having oil

dry available near the drum.

History of

Documented Release:

No releases from this SWMU have been documented.

Observations:

The floor near this drum appeared to have a recent small spill.

4.0 AREAS OF CONCERN

No AOCs were identified.

ENFORCEMENT

CONCLUSIONS AND RECOMMENDATIONS 5.0

The PA/VSI identified five SWMUs and no AOCs at the Litho-Graphic facility. Background information on the facility's location, operations, waste generating processes, history of documented release, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented release, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are conclusions and recommendations for each SWMU and AOC. Table 3 identifies the SWMUs and AOCs at the Litho-Graphic facility and suggested further actions.

SWMU 1

Indoor storage area of drummed hazardous waste

Conclusions:

This drum storage area is located within the paint room. This room was designed for containment, with cinder block walls and doorways located 8" above the floor. The probability of release to environmental media is minimal. The potential for release via environmental media is summarized below.

Groundwater:

Low. The room, designed for containment, has concrete floors.

Doorways are located 8" above the floor, limiting the possibility of

release.

Surface water: Low. The room, designed for containment, has concrete floors.

Doors are located 8" above the floor, limiting the possibility of

release.

Air:

Low. The unit is completely enclosed by cinder brick walls and

wastes are stored in closed drums.

Onsite soils:

Low. The unit has concrete floors, they keep floor dry present,

and wastes are stored in closed drums.

Recommendations:

No further action is recommended.

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SWMU 2

Incinerator/Afterburner

Conclusions:

This unit was designed to limit emissions. This unit is a permitted emission source

and releases in excess of permitted levels have never been documented.

Recommendations:

No further action is recommended at this time.

SWMU 3

Prior Location of Waste Storage Tanks

Conclusions:

An underground storage tank with unknown integrity was removed and no sampling was conducted. Both tanks were in operation for at least 8 years. The previous location of waste storage tanks is a 25x25 gravel area in the facility parking lot. No evidence of release was observed, and no history of releases are documented. The potential for release via environmental media is summarized below.

Groundwater: Moderate. No record of the tank removal has been examined.

Soils:

Moderate. The procedure used to remove the tank is not known.

Air:

Low. No fugitive gases would be created in this SWMU.

Surface water:

Low. Contaminants would be underground or at the sub-surface.

Recommendations:

Soil sampling is recommended.

SWMU 4

Scrap Metal Hoppers and Pallets

Conclusions:

A release from this SWMU is unlikely to negatively impact environmental media. The metal is stored solid and therefore is very immobile. Also, the scrap metal is

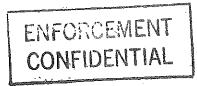
all stored inside the facility.

Recommendations:

No further action is recommended.

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SWMU 5

Satellite Accumulation Area

Conclusions:

The drums are contained in a room with a concrete floor. They are kept closed and oil dry is kept close by in the event of a spill. The potential for a release via

environmental media is low for this unit.

Recommendations:

No further action is recommended.

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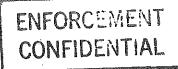


TABLE 3 SWMU SUMMARY

<u>SWMU</u>	Operational Dates	Evidence of Release	Suggested Further Action
1. Drum Storage Area	1987 to present	None	No further action
2. Incinerator	1987 to present	None	No further action
3. Prior location of waste storage tanks	Prior to 1980 to 1985	None	Soil sampling is recommended.
4. Scrap Metal Hoppers and Pallets	1987 to present	None	No further action
5. Satellite Accumulation Area	1987 to present	None	No further action

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ATTACHMENT A

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Litho-Graphic Metal Corp. Bedford Park, Illinois ILD 042 843 854

Date:

August 7, 1991

Facility Representatives:

Carol Bettiga, Owner, Litho-Graphic Metal Corp. Peggy Bettiga, Secretary, Litho-Graphic Metal Corp. William Bettiga, Owner, Litho-Graphic Metal Corp. Dan Tendy, Employer, Litho-Graphic Metal Corp.

Inspection Team:

Ramona Reints, B&V Waste Science and Technology Corp. Anil Saxena, B&V Waste Science and Technology Corp.

Photographer:

Ramona Reints

Weather Conditions:

Overcast, intermittent sprinkling, temperature 75°F.

Summary of Activities:

The visual site inspection (VSI) began at 9:30 AM with a conference between the VSI team and the previously mentioned facility representatives. Several topics were discussed at length including VSI team affiliation, VSI purpose, facility operations, facility waste streams and solid waste management units. Most of the information was exchanged on a question-and-answer basis. Carol and Peggy Bettiga provided copies of documents requested by the inspection team.

Carol Bettiga then conducted a tour of waste generating processes. Tendy and Peggy Bettiga also accompanied the VSI team. Photographs were taken without a flash after facility representatives requested a flash not be used at the paint room. As a result, this set of photos was underexposed. After this cursory tour, the inspection team requested a tour of the facility. This request was granted. After a complete tour, the inspection team conducted another conference with facility representatives. The VSI concluded at 1:30 PM.

On August 28, 1991, Reints returned to Litho-Graphic. Photographs were taken with a camera and film that eliminated the necessity of a flash. The resulting photos are satisfactory.



Photograph No. 1 Orientation: South Location: SWMU 1

Date: 08/28/91

Description: Drummed hazardous waste (spent solvent) storage area located in northeast corner of the paint

room.



Photograph No. 2 Orientation: Southeast

Description: Incinerator/afterburner located above litho-line.

Location: SWMU 2 Date: 08/28/91



Photograph No. 3 Orientation: North Description: Prior waste storage tank location.

Location: SWMU 3 Date: 08/28/91



Photograph No. 4 Orientation: East

Description: Scrap metal sheets stored on pallets.

Location: SWMU 4 Date: 08/28/91



Photograph No. 5 Orientation: Southeast

Description: Scrap metal stored in hoppers.

Location: SWMU 4 Date: 08/28/91



Photograph No. 6 Orientation: Northwest Location: SWMU 5

Date: 08/28/91

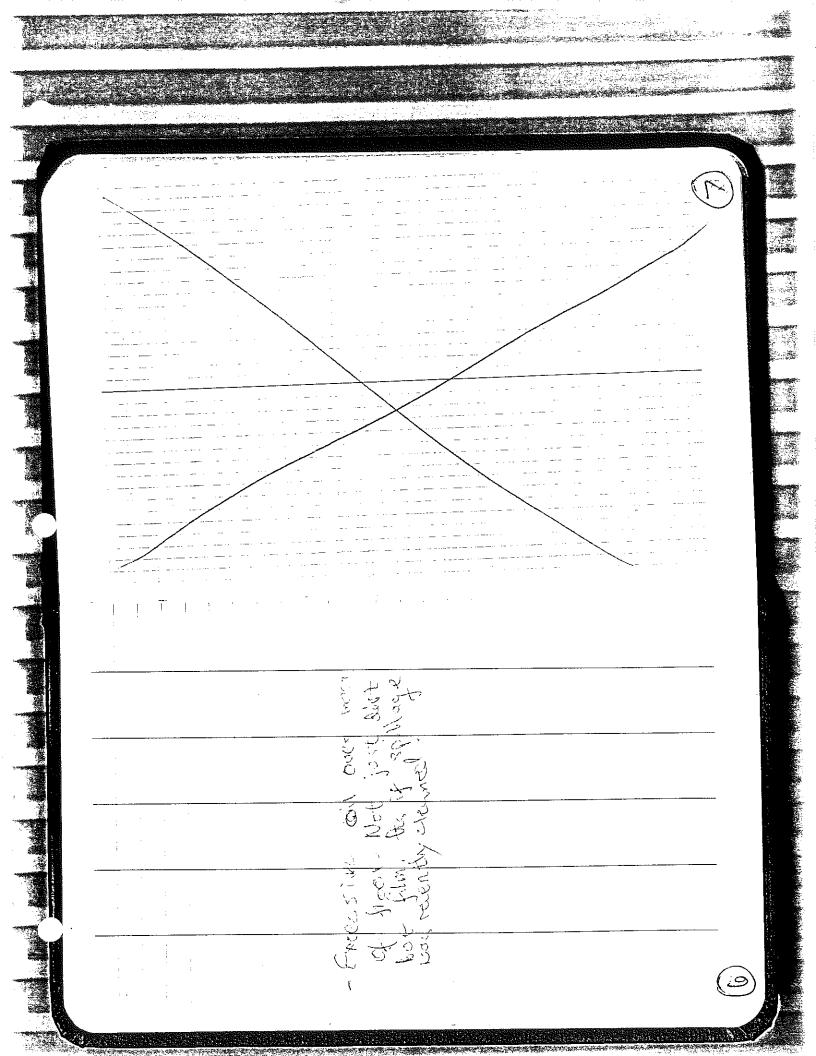
Description: Spent solvent collection drum. Note floor dry present on the floor and in the bucket.

ATTACHMENT B
VISUAL SITE INSPECTION FIELD NOTES

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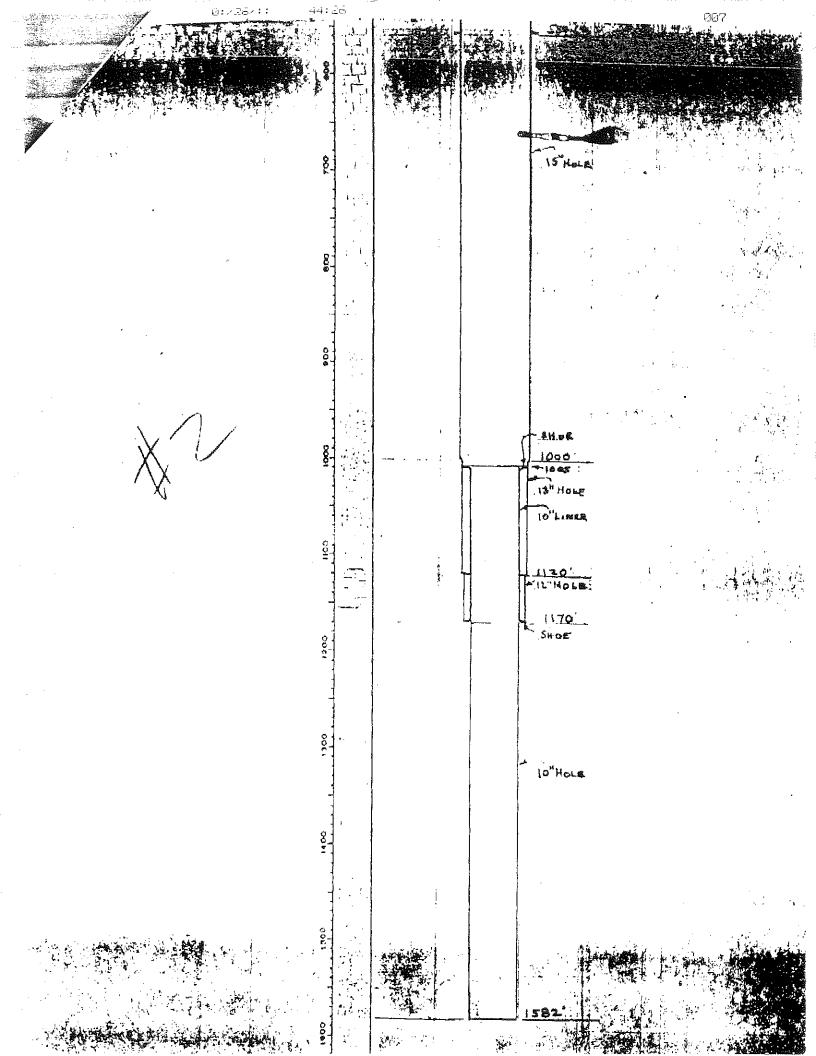
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

RECEIVED APR 0 8 1839

July 24, 1991

Mr. William Bettiga Litho-Graphic Metal Corp. 6600 South Oak Park Ave. Bedford Park, IL 60638 REPLY TO ATTENTION OF: 5HR-12

Re: Visual Site Inspection Litho-Graphic Metal Corp. ILD 042843854

Dear Mr. Bettiga:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA). The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern, and to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI will be conducted on August 7, 1991, beginning at 9:00 a.m. The inspection team will consist of Ramona Reints and Anil Saxena of B&V

Waste Science and Technology Corp., contractors for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions portion, may be made available upon request.

Sincerely yours,

Aheri J. Braceher for Kevin M. Pierard, Chief OH/MN Technical Enforcement Section

cc: Larry Eastep, IEPA - Springfield John Maher, IEPA - Maywood

CERTIFICATION REGARDING POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: _	TEXTRON	INC. 7	TOWN SEND	DIV.
EPA I.D. NUMBER:	ILDO	428430	254	
LOCATION CITY: _	BEN FOR	D PARI	K	
STATE: _	166	60630	Lucar }	
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NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

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